

DOCUMENT 2

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF GEOFFREY C.
RUSHING IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION TO
COMPEL JURISDICTIONAL DISCOVERY
FROM THE IRICO DEFENDANTS**

Special Master: Hon. Vaughn R. Walker (Ret.)

CONFIDENTIAL:
SUBJECT TO PROTECTIVE ORDER

1 I, Geoffrey C. Rushing, declare:

2 1. I am of counsel to Saveri & Saveri, Inc., Lead Counsel for Direct Purchaser
3 Plaintiffs (“DPPs”) in this action. I am a member of the Bar of the State of California and admitted
4 to practice in the Northern District of California. I have been involved in virtually every aspect of
5 this case from its outset in 2007. I make this Declaration in Support of DPPs’ Motion to Compel
6 Jurisdictional Discovery from the Irico Defendants. Except as otherwise stated, I have personal
7 knowledge of the facts stated below.

8 2. On March 5, 2018, DPPs served their first set of interrogatories and their first set of
9 requests for production of documents on counsel for Defendants Irico Display Devices Co., Ltd.
10 and Irico Group Corporation (the “Irico Defendants”). Attached hereto as Exhibit 1 is a true and
11 correct copy of Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of Interrogatories to
12 Irico Group Corporation and Irico Display Devices Co., Ltd., dated March 5, 2018. Attached hereto
13 as Exhibit 2 is a true and correct copy of Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First
14 Set of Requests for Production of Documents to Irico Group Corporation and Irico Display Devices
15 Co., Ltd., dated March 5, 2018. DPPs granted the Irico Defendants a 30-day extension of time to
16 respond to this discovery.

17 3. On May 4, 2018, the Irico Defendants served their responses to DPPs’ March 5,
18 2018 discovery. Attached hereto as Exhibit 3 is a true and correct copy of Irico Defendants’
19 Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of
20 Interrogatories, dated May 4, 2018, including the verification of the same, dated May 18, 2018,
21 which I received via email from Mr. Plunkett on May 21, 2018. Attached hereto as Exhibit 4 is a
22 true and correct copy of Irico Defendants’ Objections and Responses to Direct Purchaser Plaintiff
23 Studio Spectrum, Inc.’s First Set of Requests for Production of Documents, dated May 4, 2018.
24 Also on May 4, 2018, the Irico Defendants produced documents, labeled “IRI-CRT001” and
25 consisting of 156 documents bearing Bates numbers IRI-CRT-00000001–IRI-CRT-00000904, by
26 FTP site.

27 4. On May 30, 2018, the Irico Defendants reproduced IRI-CRT001 to include
28 corrected Chinese text files. Attached here as Exhibit 5 is a true and correct copy of the “IRI-

1 CRT001.DAT" data file produced with the corrected IRI-CRT001 containing the metadata for the
2 production, including the custodians. It has been saved as a PDF file for the purposes of this
3 declaration. The two unique custodians listed in data file are "Public Website" and "Irico Corporate
4 Archives."

5 5. On May 17, 2018, DPP counsel Matthew D. Heaphy sent a letter to the Irico
6 Defendants' counsel, John Taladay of Baker Botts LLP, regarding the Irico Defendants' responses
7 and requesting meet and confer. Attached hereto as Exhibit 6 is a true and correct copy of Mr.
8 Heaphy's letter.

9 6. On May 28, 2018, counsel for the Irico Defendants, Stuart C. Plunkett of Baker
10 Botts LLP, responded to Mr. Heaphy's letter. Attached hereto as Exhibit 7 is a true and correct
11 copy of Mr. Plunkett's letter, dated May 28, 2018.

12 7. On May 29, May 30, and June 1, 2018, counsel for DPPs, Indirect Purchaser
13 Plaintiffs ("IPPs"), and the Irico Defendants held three one-hour conference calls to discuss the
14 Irico Defendants' responses as well as their responses to IPPs' discovery requests. On June 4,
15 2018, Mr. Plunkett sent a letter to DPP counsel, including me, identifying specific documents
16 supporting the Irico Defendants' interrogatory responses. Attached hereto as Exhibit 8 is a true and
17 correct copy of Mr. Plunkett's letter, dated June 4, 2018. DPPs are currently reviewing the relevant
18 Interrogatory Responses along with the references to the documents—most of which are in Chinese
19 and thus require translation—to determine the adequacy of both, and may bring a motion to compel
20 with regard to some or all of these responses.

21 8. On June 5, 2018, I sent a letter to Mr. Plunkett memorializing the three meet and
22 confer calls as they related to DPPs' discovery. Attached hereto as Exhibit 9 is a true and correct
23 copy of my letter to Mr. Plunkett.

24 9. On June 21, 2018, I sent a letter to Mr. Plunkett regarding outstanding information
25 the Irico Defendants had agreed to provide to Plaintiffs. Attached hereto at Exhibit 10 is a true and
26 correct copy of my letter to Mr. Plunkett dated June 21, 2018. To date, DPPs have received no
27 response.

28 10. On June 15, 2018, I received a letter from Mr. Plunkett requesting that DPPs return

1 or destroy certain documents that were inadvertently produced. Attached hereto as Exhibit 11 is a
2 true and correct copy of Mr. Plunkett's letter, dated June 15, 2018. According to analysis done
3 prior to the clawback request by a native Chinese language attorney working under my direction,
4 the documents included some which appear to show U.S. CRT sales in 1995, 1998, 1999, 2001,
5 2002, and 2003 totaling approximately \$2 million. On June 20, 2018, I sent a letter to Mr. Plunkett
6 stating that the documents did not appear to be privileged and asked for further information.

7 Attached hereto as Exhibit 12 is a true and correct copy of my letter to Mr. Plunkett, dated June 20,
8 2018. On the same day, Mr. Saveri sent a letter to The Honorable Vaughn R. Walker, the special
9 master for discovery in this action, transmitting the disputed documents in case the parties could
10 not resolve their dispute. Attached hereto as Exhibit 13 is a true and correct copy of Mr. Saveri's
11 letter to Judge Walker, dated June 20, 2018. On June 21, 2018, I received a call from Mr. Plunkett
12 during which he stated that the Irico Defendants intended to withdraw their "clawback" request as
13 to all but one page of the documents, and that they would send a formal letter to that effect shortly.
14 On June 29, 2018, I received a letter from Mr. Plunkett so confirming. Attached hereto as Exhibit
15 14 is a true and correct copy of Mr. Plunkett's letter to DPP counsel, including me.

16 11. On June 29, 2018, I received an email from counsel for the Irico Defendants,
17 Thomas E. Carter, containing current or recent job titles of persons identified as having knowledge
18 of the Irico Defendants' Interrogatory Responses, and an updated attachment containing the Irico
19 Defendants' response to a request for information about potential witnesses. Attached hereto at
20 Exhibit 15 is a true and correct copy of Mr. Carter's email and attachment, dated June 29, 2018.

21 12. I am informed that on January 15, 2009, counsel for the Irico Defendants
22 transmitted a Response to Information Requests and certain sales information, bearing Bates
23 stamps bates stamped as IRICO-00001–IRICO-00022, to counsel for DPPs and IPPs. Attached
24 hereto as Exhibit 16 is a true and correct copy of an e-mail and three attachments from Philip
25 Simpkins of Pillsbury Winthrop Shaw Pittman LLP, then counsel for the Irico Defendants, to DPP
26 counsel Cadio Zirpoli, dated January 15, 2009.

27 ///

28 ///

1 I declare under the penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct.

3 Executed this 5th day of July, 2018 in San Francisco, California.

4
5 */s/ Geoffrey C. Rushing*
6 Geoffrey C. Rushing
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EXHIBIT 1

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Lead Counsel for Direct Purchaser Plaintiffs

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IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates To:

ALL DIRECT PURCHASER ACTIONS

DIRECT PURCHASER PLAINTIFF STUDIO SPECTRUM, INC.'S FIRST SET OF INTERROGATORIES TO IRICO GROUP CORPORATION AND IRICO DISPLAY DEVICES CO., LTD.

1 PROPOUNDING PARTY: STUDIO SPECTRUM, INC.

2 RESPONDING PARTIES: IRICO GROUP CORPORATION

3 IRICO DISPLAY DEVICES CO., LTD.

4 SET NO.: ONE

5 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Direct Purchaser
6 Plaintiff Studio Spectrum, Inc. (“Plaintiff”), through its counsel, requests that defendants Irizo
7 Group Corporation and Irizo Display Devices Co., Ltd. serve verified responses to the following
8 set of interrogatories on Plaintiff within thirty (30) days after the date of service of these
9 interrogatories:

10 **DEFINITIONS**

11 1. The term “Defendant” means defendants Irizo Group Corporation and Irizo Display
12 Devices Co., Ltd.

13 2. The term “Irizo” means defendants Irizo Group Corporation and Irizo Display
14 Devices Co., Ltd.

15 3. The term “Group” means defendant Irizo Group Corporation.

16 4. The term “Display” means defendant Irizo Display Devices Co., Ltd.

17 5. The term “Person” or “Persons” means any natural person, corporation, or
18 partnership, proprietorship, joint venture, or any business, legal, or government entity,
19 organization, or association.

20 6. “You” or “Your” mean the responding Defendant, its predecessors, successors,
21 subsidiaries, departments, divisions, and/or affiliates, including without limitation any organization
22 or entity which the responding Defendant manages or controls, together with all present and former
23 directors, officers, Employees, agents, representatives or any Persons acting or purporting to act on
24 behalf of the responding Defendant.

25 7. “Or” and “and” should be construed so as to require the broadest possible response.
26 If, for example, an interrogatory calls for information about “A or B” or “A and B,” You should
27 provide all information about A and all information about B, as well as all information about A and

1 B collectively. In other words, “or” and “and” should be read as “and/or.”

2 8. The terms “Document” or “Documents” means the original and any non-identical
3 copy of all items subject to discovery under Rule 34 of the Federal Rules of Civil Procedure. This
4 definition includes any written, printed, reproduced, graphic, photographic, electronic, audio,
5 visual, or video records, however produced or reproduced, of any kind or description, whether
6 prepared by You or by any other Person, that is in Your possession, custody, or control, including,
7 but not limited to, the following: emails; correspondence; memoranda; travel records; summaries;
8 agreements; electronically stored information; papers; notes; books; invoices, letters; facsimiles;
9 intra- and interoffice communications; transcripts; minutes or other records of Meetings; reports;
10 affidavits; statements; legal pleadings; calendars; appointment books; diaries; notebooks; telephone
11 logs; records of telephone conversations; compilations; work papers; graphs; charts; blueprints;
12 sales, advertising, and promotional literature; agreements; pamphlets; brochures; circulars;
13 manuals; instructions; ledgers; drawings; sketches; photographs; screen shots; video recordings;
14 audio recordings; film and sound reproductions; internal or external web sites; compact discs;
15 computer files and disks; and social media communications, including, but not limited to,
16 information posted on or transmitted through social networking platforms (*e.g.*, LinkedIn,
17 Facebook, MySpace and Instagram), digital file-sharing services (*e.g.*, Flickr), blogs and
18 microblogs (*e.g.*, Twitter), Voice Over Internet Protocol services (*e.g.*, Skype), and/or instant
19 messages.

20 9. “Employee” means, without limitation, any current or former officer, director,
21 executive, manager, secretary, staff member, messenger, agent or other Person who is or was
22 employed by Defendant.

23 10. The term cathode ray tube, or “CRT,” means both (a) color picture tubes (“CPTs”),
24 which are CRTs used primarily in color televisions; and (b) color display tubes (“CDTs”), which
25 are CRTs used primarily in color computer monitors.

26 11. The term “CRT Products” means electronic devices containing CPTs (such as
27 televisions) or CDTs (such as computer monitors).

28 12. The term “Relevant Time Period” means the period from January 1, 1995 through

1 the present.

2 13. The term “Class Period” means the period from March 1, 1995 through November
3 25, 2007.

4 14. The term “Communication” or “Communications” means, without limitation, any
5 disclosure, transfer, or exchange of information, opinions, ideas or thoughts, by any means, face-
6 to-face meetings, written, recorded, electronically, orally or otherwise, at any time or place under
7 any circumstances. This definition shall include communication via social media, including, but
8 not limited to, information, opinions, ideas, or thoughts, posted on or transmitted through social
9 networking platforms (*e.g.*, LinkedIn, Facebook, MySpace and Instagram), digital file-sharing
10 services (*e.g.*, Flickr), blogs and microblogs (*e.g.*, Twitter), Voice Over Internet Protocol services
11 (*e.g.*, Skype), and/or instant messages.

12 15. The term “Date” means the exact day, month and year, if ascertainable, or the best
13 available approximation, including any relationship to other known events (designate whether
14 exact or approximate).

15 16. The term “Meeting” means, without limitation, any assembly, convocation,
16 encounter, or contemporaneous presence of two or more Persons for any purpose, whether planned
17 or arranged, scheduled or not.

18 17. The term “China” means the People’s Republic of China.

19 18. The term “Chinese Law” means, without limitation, any law or regulation of China,
20 or any law or regulation of any subnational government within China.

21 19. The term “Zhang Declaration” refers to the Declaration of Wenkai Zhang in Support
22 of Irico’s Motion to Set Aside Default, ECF No. 5215-1, filed on October 25, 2017.

23 20. The term “SASAC” means the State-owned Assets Supervision and Administration
24 Commission of the State Council of the People’s Republic of China.

INSTRUCTIONS

25 1. When asked to identify a natural person, state the person’s name, employer, position
26 dates of employment/tenure, and home address for all times during the Relevant Time Period. If
27 any of such information has changed during the Relevant Time Period, specify the time period to

1 which the information provided in your answer pertains.

2 2. When asked to identify any entity other than a natural person, state the name and
3 address of the principal office or headquarters. If any of the information has changed during the
4 Relevant Time Period, specify the time period to which the information provided in your answer
5 pertains.

6 3. If Defendant elects to produce documents or business records in response to an
7 interrogatory pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, the responding party
8 shall produce the records as they are kept in the usual course of business or shall organize and label
9 them to correspond with the interrogatory. If the document is being produced in its native
10 electronic format (allowing the document to retain its metadata), identify the document using its
11 hash or other appropriate electronic identification and identify the interrogatories to which the
12 document is responsive. If the document is not being produced in electronic form, identify the
13 document using the applicable Bates numbers or specifically identify the type of document being
14 produced (e.g., letter, memorandum, telegram, contract, invoice, etc.), its date and author(s), its
15 custodian, and every Person to whom such document or any copy thereof was given or sent. For all
16 documents produced pursuant to Rule 33(d), identify the name of the Employee, officer, or agent
17 certifying the documents as business records.

18 **INTERROGATORIES**

19 **INTERROGATORY NO. 1**

20 Please describe in detail the circumstances surrounding Group's creation, including:

21 a. The identity of all Persons with knowledge of Group's creation; and
22 b. The identity of all Documents that refer or relate to Group's creation.

23 **INTERROGATORY NO. 2**

24 Please describe in detail the circumstances surrounding Display's creation, including:

25 a. The identity of all Persons with knowledge of Display's creation; and
26 b. The identity of all Documents that refer or relate to Display's creation.

27 **INTERROGATORY NO. 3**

28 Please describe the direct ownership of Group from 2006 to 2008, including:

- 1 a. The identity of all Persons with knowledge of Group's ownership from 2006 to
- 2 2008; and
- 3 b. The identity of all Documents which refer or relate to Group's ownership from 2006
- 4 to 2008.

INTERROGATORY NO. 4

5 Please describe the direct ownership of Display from 2006 to 2008, including:

- 6 a. The identity of all Persons with knowledge of Display's ownership from 2006 to
- 7 2008; and
- 8 b. The identity of all Documents which refer or relate to Display's ownership from
- 9 2006 to 2008.

INTERROGATORY NO. 5

10 Please describe any status, obligations, and/or privileges that Group or Display had under
11 Chinese Law from 2006 to 2008 because of the alleged status of Group or Display as an agency,
12 instrumentality, and/or organ of China, including:

- 13 a. The identity of all Persons with knowledge of Group's or Display's special status,
14 obligations, and/or privileges under Chinese Law from 2006 to 2008; and
- 15 b. The identity of all Documents which refer or relate to Group's or Display's special
16 status, obligations, and/or privileges under Chinese Law from 2006 to 2008.

INTERROGATORY NO. 6

17 Please describe any Chinese government supervision of Group from 2006 to 2008,
18 including:

- 19 a. The identity (including government job title) of any Chinese officials involved in
20 such supervision;
- 21 b. The identity of all Documents referring or relating to such supervision; and
- 22 c. The identity of other Persons with knowledge of such supervision.

INTERROGATORY NO. 7

23 Please describe any Chinese government supervision of Display from 2006 to 2008,
24 including:

- 1 a. The identity (including government job title) of any Chinese officials involved in
- 2 such supervision;
- 3 b. The identity of all Documents referring or relating to such supervision; and
- 4 c. The identity of other Persons with knowledge of such supervision.

INTERROGATORY NO. 8

Describe the role, if any, that Irico Group Electronics Co., Ltd. played in the management and/or supervision of Display from 2006 to 2008, including:

- 8 a. The identity of all Persons with knowledge of such management and/or supervision;
- 9 and
- 10 b. The identity of all Documents which refer or relate to such management and/or
- 11 supervision.

INTERROGATORY NO. 9

Please describe with particularity all investigation or collection of information that Wenkai Zhang performed in connection with the preparation of his declaration, including:

- 15 a. The identity of all Employees, officers or agents of Irico with whom he
- 16 communicated (whether oral or written) in connection with his declaration; and
- 17 b. The identity of all Documents he reviewed in connection with his declaration.

INTERROGATORY NO. 10

Explain with particularity the basis for Your contention that Group was managed directly by the Chinese government (or a political subdivision thereof) through the filing of the original complaint herein, including:

- 22 a. The identity of all Persons with knowledge of such management; and
- 23 b. The identity of all Documents which refer or relate to such management.

INTERROGATORY NO. 11

Please describe with particularity the basis for the contention, as stated in paragraph 7 of the Zhang Declaration, that "Irico Group's management, including its Legal Representative and General Manager, was appointed directly . . . by the SASAC after 2003," including:

- 28 a. The identity of all Persons with knowledge of the appointment of Group's

management; and

b. The identity of all Documents which refer or relate to the appointment of Group's management.

INTERROGATORY NO. 12

Please describe with particularity the basis for the contention, as stated in paragraph 8 of the Zhang Declaration, that “[a]t the time the DPP’s original complaint was filed on November 26, 2007, Irizo Display was a State-owned holding company,” including:

- a. The identity of all Persons with knowledge of the basis for the contention; and
- b. The identity of all Documents sufficient to support that contention.

INTERROGATORY NO. 13

Please describe with particularity the basis for the contention, as stated in paragraph 8 of the Zhang Declaration, that ‘‘Irico Display’s management was appointed by the State Council-appointed management of Irico Group and reviewed by Irico Display’s shareholders,’’ including:

- a. The identity of all Persons with knowledge of the appointment of Display's management; and
- b. The identity of all Documents which refer or relate to the appointment of Display's management.

INTERROGATORY NO. 14

Please describe with particularity the basis for the contention, as stated in paragraph 8 of the Zhang Declaration, that “Irico Display’s management was subject to the same regulations that apply to state officials,” including:

- a. The identity of all Persons with knowledge of the basis for the contention; and
- b. The identity of all Documents supporting the contention.

INTERROGATORY NO. 15

Please describe with particularity the basis for the contention, as stated in paragraph 9 of the Zhang Declaration, that “Irico Display was managed directly by the State Council-appointed management of Irico Group and indirectly by the Ministry of Industry and Information Technology of the State Council,” including:

- 1 a. The identity of all Persons with knowledge of the basis for the contention; and
- 2 b. The identity of all Documents supporting the contention.

INTERROGATORY NO. 16

4 Please describe with particularity the basis for the contention, as stated in paragraph 9 of the
5 Zhang Declaration, that “Irico Group directly appointed the management of Irico Display,”
6 including:

- 7 a. The identity of all Persons with knowledge of the basis for the contention; and
- 8 b. The identity of all Documents supporting the contention.

INTERROGATORY NO. 17

10 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
11 the Zhang Declaration, that “[a]ny major business decisions or transactions entered into or
12 contemplated by Irico Display required review and approval by Irico Group and/or the Ministry of
13 Industry and Information Technology of the State Council, or another appropriate department of
14 the State Council,” including:

- 15 a. The identity of all Persons with knowledge of the basis for the contention; and
- 16 b. The identity of all Documents which support the contention.

INTERROGATORY NO. 18

18 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
19 the Zhang Declaration, that “Irico Display was required to submit financial statements and reports
20 about operating activities and investments to Irico Group for review,” including:

- 21 a. The identity of all Persons with knowledge of the basis for the contention; and
- 22 b. The identity of all Documents which support the contention.

INTERROGATORY NO. 19

24 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
25 the Zhang Declaration, that “[f]or some matters beyond Irico Group’s authority—including (1)
26 material investments by Irico Display, (2) mergers and acquisitions by Irico Display, (3) sale of
27 shares resulting in a change in control over the company, (4) declaration of bankruptcy or cessation
28 of operations by Irico Display, (5) financing, including issuance of stocks and bonds, and (6)

1 proposed budgets—Irico Group had to obtain approval from the relevant agency of the State
2 Council in order for Irico Display to take such action” and “[t]hus, Irico Display’s business and
3 operations were controlled and supervised by Irico Group, as well as the relevant departments of
4 the State Council,” including:

- 5 a. The identity of all Persons with knowledge of the basis for the contention;
- 6 b. The identity of all Documents which support the contention; and
- 7 c. All instances in which approval was sought from, granted or denied in whole or in
8 part by the “relevant agency of the State Council.”

9 **INTERROGATORY NO. 20**

10 Please describe with particularity Irico’s sales and marketing of CRT Products in the United
11 States during the Class Period, and/or attempts to sell or market any CRT Products in the United
12 States during the Class Period, including:

- 13 a. The identity of all Persons with knowledge of such sales and marketing and/or
14 attempts to sell or market CRT Products in the United States; and
- 15 b. The identity of all Documents referring or relating to such sales and marketing
16 and/or attempts to sell or market CRT Products in the United States.

17 **INTERROGATORY NO. 21**

18 Please describe with particularity the basis for the contention, as stated in the Reply Brief of
19 Irico in Support of Motion to Set Aside Default (ECF No. 5229), that “the pricing activity that
20 DPPs allege to result from illegal conduct was mandated by the Chinese government,” including:

- 21 a. The identity of all Persons with knowledge of the basis for the contention; and
- 22 b. The identity of all Documents which support the contention.

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1 DATED: March 5, 2018

2 By: /s/ R. Alexander Saveri

3 Guido Saveri
4 R. Alexander Saveri
5 Geoffrey C. Rushing
6 Cadio Zirpoli
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18 *Attorneys for Plaintiffs*

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Lead Counsel for Direct Purchaser Plaintiffs

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SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates To:

ALL DIRECT PURCHASER ACTIONS

**DIRECT PURCHASER PLAINTIFF
STUDIO SPECTRUM, INC.'S FIRST
SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
IRICO GROUP CORPORATION AND
IRICO DISPLAY DEVICES CO., LTD.**

1 PROPOUNDING PARTY: STUDIO SPECTRUM, INC.

2 RESPONDING PARTIES: IRICO GROUP CORPORATION

3 IRICO DISPLAY DEVICES CO., LTD.

4 SET NO.: ONE

5 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Direct Purchaser
6 Plaintiff Studio Spectrum, Inc. (“Plaintiff”), through its counsel, requests that defendants Irizo
7 Group Corporation and Irizo Display Devices Co., Ltd. respond to each of the following requests
8 for production of documents, and produce all responsive Documents for inspection and copying
9 within thirty (30) days of service.

10 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, these requests are
11 continuing in nature so that if Defendant, its directors, officers, Employees, agents, representatives
12 or any Person acting, or purporting to act, on behalf of Defendant, discover any Document(s)
13 requested or required to be produced, Defendant shall make such Document(s) available.

14 **DEFINITIONS**

15 1. “All” should be construed to include the collective as well as the singular and shall
16 mean “each,” “any,” and “every.”

17 2. “Any” shall be construed to mean “any and all.”

18 3. The term “Communication” or “Communications” means, without limitation, any
19 disclosure, transfer, or exchange of information, opinions, ideas or thoughts, by any means, face-
20 to-face meetings, written, recorded, electronically, orally or otherwise, at any time or place under
21 any circumstances. This definition shall include communication via social media, including, but
22 not limited to, information, opinions, ideas, or thoughts, posted on or transmitted through social
23 networking platforms (*e.g.*, LinkedIn, Facebook, MySpace and Instagram), digital file-sharing
24 services (*e.g.*, Flickr), blogs and microblogs (*e.g.*, Twitter), Voice Over Internet Protocol services
25 (*e.g.*, Skype), and/or instant messages.

26 4. “Date” means the exact day, month and year, if ascertainable, or the best available
27 approximation, including any relationship to other known events (designate whether exact or

1 approximate).

2 5. The term “Defendant” means defendants Irico Group Corporation and Irico Display
3 Devices Co., Ltd.

4 6. The term “Group” means defendant Irico Group Corporation.

5 7. The term “Display” means defendant Irico Display Devices Co., Ltd.

6 8. The terms “Document” or “Documents” mean the original and any non-identical
7 copy of all items subject to discovery under Rule 34 of the Federal Rules of Civil Procedure. This
8 definition includes any written, printed, reproduced, graphic, photographic, electronic, audio,
9 visual, or video records, however produced or reproduced, of any kind or description, whether
10 prepared by you or by any other Person, that is in Your possession, custody, or control, including,
11 but not limited to, the following: emails; correspondence; memoranda; travel records; summaries;
12 agreements; electronically stored information; papers; notes; books; invoices, letters; facsimiles;
13 intra- and interoffice communications; transcripts; minutes or other records of Meetings; reports;
14 affidavits; statements; legal pleadings; calendars; appointment books; diaries; notebooks; telephone
15 logs; records of telephone conversations; compilations; work papers; graphs; charts; blueprints;
16 sales, advertising, and promotional literature; agreements; pamphlets; brochures; circulars;
17 manuals; instructions; ledgers; drawings; sketches; photographs; screen shots; video recordings;
18 audio recordings; film and sound reproductions; internal or external web sites; compact discs;
19 computer files and disks; and social media communications, including, but not limited to,
20 information posted on or transmitted through social networking platforms (*e.g.*, LinkedIn,
21 Facebook, MySpace and Instagram), digital file-sharing services (*e.g.*, Flickr), blogs and
22 microblogs (*e.g.*, Twitter), Voice Over Internet Protocol services (*e.g.*, Skype), and/or instant
23 messages.

24 9. “Electronically stored information” (ESI) includes, without limitation, the
25 following:

26 a. activity listings of electronic mail receipts and/or transmittals;

27 b. output resulting from the use of any software program, including, without
28 limitation, word processing Documents, spreadsheets, database files, charts, graphs and

1 outlines, electronic mail, AOL Instant Messenger™ (or similar program) or bulletin board
2 programs, operating systems, source code, PRF files, PRC files, batch files, ASCII files,
3 and all miscellaneous media on which they reside and regardless of whether said
4 electronically stored information exists in an active file, a deleted file, or file fragment;

5 c. any and all items stored on computer memories, hard disks, floppy disks,
6 CD-ROM, magnetic tape, microfiche, or in any other vehicle for digital data storage and/or
7 transmittal, such as, but not limited to, a personal digital assistant, *e.g.*, Palm Pilot, R.I.M.,
8 Blackberry, or similar device, and file folder tabs, and/or containers and labels appended to,
9 or relating to, any physical storage device associated with each original and/or copy of all
10 Documents requested herein.

11 10. “Employee” means, without limitation, any current or former officer, director,
12 executive, manager, secretary, staff member, messenger, agent or other Person who is or was
13 employed by Defendant.

14 11. “Including” is used to emphasize certain types of Documents requested and should
15 not be construed as limiting the request in any way.

16 12. The term “Meeting” means, without limitation, any assembly, convocation,
17 encounter, or contemporaneous presence of two or more Persons for any purpose, whether planned
18 or arranged, scheduled or not.

19 13. “Or” and “and” should be construed so as to require the broadest possible response.
20 If, for example, a request calls for information about “A or B” or “A and B,” You should produce
21 all information about A and all information about B, as well as all information about A and B
22 collectively. In other words, “or” and “and” should be read as “and/or.”

23 14. The term “Person” or “Persons” means any natural person, corporation, or
24 partnership, proprietorship, joint venture, or any business, legal, or government entity,
25 organization, or association.

26 15. “Relating to,” “referring to,” “regarding,” or “with respect to” mean, without
27 limitation, the following concepts: discussing, describing, reflecting, dealing with, pertaining to,
28 analyzing, evaluating, estimating, constituting, studying, surveying, projecting, assessing,

1 recording, summarizing, criticizing, reporting, commenting, or otherwise involving, in whole or in
2 part.

3 16. "You" or "Your" mean the responding Defendant, its predecessors, successors,
4 subsidiaries, departments, divisions, and/or affiliates, including without limitation any organization
5 or entity which the responding Defendant manages or controls, together with all present and former
6 directors, officers, Employees, agents, representatives or any Persons acting or purporting to act on
7 behalf of the responding Defendant.

8 17. Unless otherwise noted, the Relevant Time Period for these requests is January 1,
9 1995 through the present (the "Relevant Time Period").

10 18. The term "Class Period" means the period from March 1, 1995 through November
11 25, 2007.

12 19. The term cathode ray tube, or "CRT," means both (a) color picture tubes ("CPTs"),
13 which are CRTs used primarily in color televisions; and (b) color display tubes ("CDTs"), which
14 are CRTs used primarily in color computer monitors.

15 20. The "Zhang Declaration" refers to the Declaration of Wenkai Zhang in Support of
16 Irico's Motion to Set Aside Default, ECF No. 5215-1, filed on October 25, 2017.

17 21. The term "Chinese Law" means, without limitation, any law or regulation of China,
18 or any law or regulation of any subnational government within China.

INSTRUCTIONS

20 1. These requests seek all responsive Documents created or generated during the
21 Relevant Time Period, as well as responsive Documents created or generated outside the Relevant
22 Time Period, but which contain information concerning the Relevant Time Period.

23 2. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these requests are
24 continuing in nature so that if You subsequently discover or obtain possession, custody, or control
25 of any Document covered by these requests, You shall promptly make any such Document(s)
26 available to Plaintiff.

27 3. In producing Documents and other materials, You are to furnish all Documents or
28 things in Your possession, custody or control, regardless of whether such Documents or materials

1 are possessed directly by You or Your Employees, agents, parent company(ies), subsidiaries,
2 affiliates, investigators or by Your attorneys or their employees, agents or investigators.

3 4. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, all Documents shall
4 be produced in the same order as they are kept or maintained by You in the ordinary course of
5 Your business. All Documents shall be produced in the file folder, envelope or other container in
6 which the Documents are kept or maintained. If for any reason the container cannot be produced,
7 You should produce copies of all labels or other identifying marks which may be present on the
8 container.

9 5. Documents shall be produced in such fashion as to identify the department, branch
10 or office in whose possession they were located and, where applicable, the natural person in whose
11 possession they were found and the business address of each Document's custodian(s).

12 6. Documents attached to one another should not be separated. If any portion of any
13 Document is responsive to any portion of the requests below, then the entire Document must be
14 produced.

15 7. If a Document once existed and subsequently has been lost, destroyed or is
16 otherwise missing, You should provide sufficient information to identify the Document and state,
17 in writing, the details, including whether the Document:

- 18 a. is lost or missing;
- 19 b. has been destroyed and, if so, by whom at whose request;
- 20 c. has been transferred or delivered, voluntarily or involuntarily, to another
21 Person or entity and at whose request; and/or
- 22 d. has been otherwise disposed of.

23 8. In each instance in which a Document once existed and subsequently is lost,
24 missing, destroyed, or otherwise disposed of, explain the circumstances surrounding the disposition
25 of the Document, including, but not limited to:

- 26 a. the identity of the Person or entity who last possessed the Document;
- 27 b. the date or approximate date of the Documents disposition; and
- 28 c. the identity of all Persons who have or had knowledge of the Document's

1 contents.

2 9. If any Document responsive to any of these requests is privileged, and the
3 Document or any portion of the Document requested is withheld based on a claim of privilege
4 pursuant to Rule 26(b)(5) of the Federal Rules of Civil Procedure, provide a statement of the claim
5 of privilege and all facts relied upon in support of that claim, including the following information:

6 a. the reason for withholding the Document;

7 b. the date of such communication;

8 c. the medium of such communication;

9 d. the general subject matter of such communication (such description shall not
10 be considered a waiver of Your claimed privilege);

11 e. the identity of any Document that was the subject of such communication
12 and the present location of any such Document;

13 f. the identity of the Persons involved in such communication;

14 g. the identity of any Document which records, refers, or relates to such
15 communication and the present location of any such Document;

16 h. the paragraph or paragraphs of these requests for production of Documents
17 to which such information is responsive.

18 10. Each Document requested herein should be produced in its entirety and without
19 deletion, redaction or excisions, except as qualified by Instruction 9 above, regardless of whether
20 You consider the entire Document or only part of it to be relevant or responsive to these requests.
21 If You have redacted any portion of a Document, stamp the word “REDACTED” beside the
22 redacted information on each page of the Document which You have redacted. Any redactions to
23 Documents produced should be identified in accordance with Instruction 9 above.

24 11. All Documents produced in paper form should be Bates numbered sequentially,
25 with a unique number on each page, and with a prefix identifying the party producing the
26 Document.

27 12. Pursuant to Rule 34(b)(1)(C) of the Federal Rules of Civil Procedure, the responding
28 party must produce any electronically stored information (“ESI”) in its native format. If ESI in its

1 native format can only be accessed by proprietary or legacy software, or is password protected, or
2 encrypted, the responding party must meet and confer with counsel for Plaintiffs so the receiving
3 party shall receive all information and software necessary to access the ESI.

4 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

5 **REQUEST NO. 1**

6 All versions of or amendments to any corporate charter, articles of incorporation, articles of
7 association, articles of organization, bylaws, or similar corporate governing document for Group
8 and Display.

9 **REQUEST NO. 2**

10 Documents sufficient to show Group and Display's corporate formation, ownership,
11 purpose, structure, and organization (including any organization charts) from the time of each
12 entity's creation to 2008.

13 **REQUEST NO. 3**

14 All documents related to communications from Group and/or Display to any shareholder or
15 owner of Group and/or Display from 2006 to 2008, including but not limited to any annual,
16 quarterly, or other periodic reports and any supplemental disclosures related to any such reports.

17 **REQUEST NO. 4**

18 All documents related to Chinese government ownership and/or supervision of Group and
19 of Display from 2006 to 2008.

20 **REQUEST NO. 5**

21 All documents related to any status, obligations, or privileges that Group or Display had
22 under Chinese Law during the period from 2006 to 2008 because of the alleged status of Group
23 and/or Display as an agency, instrumentality, and/or organ of China.

24 **REQUEST NO. 6**

25 All documents related to communications between Group, Display, or any affiliate of
26 Group or Display, and any individual identified in response to Interrogatory Nos. 6(a) and 7(a),
27 included in Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories to Irico
28 Group Corporation and Irico Display Devices Co, Ltd., dated March 5, 2018.

1 **REQUEST NO. 7**

2 All documents related to the statement in the Zhang Declaration that “Irico declined to
3 answer [the DPP’s complaint] because it believed that Irico Group and Irico Display were immune
4 from suit in the United States,” including but not limited to any communication with outside
5 counsel related to such immunity from 2007 to 2010.

6 **REQUEST NO. 8**

7 All documents related to pricing of CRTs during the Class Period by Group, Display, or
8 any affiliate of Group or Display.

9 **REQUEST NO. 9**

10 All documents related to the sale or pricing of CRTs in the United States (including but not
11 limited to any actual, planned, or contemplated sales of CRTs in the United States by Group,
12 Display, or any affiliate of Group or Display, either directly or indirectly) during the Class Period.

13 **REQUEST NO. 10**

14 All documents related to any Meeting identified in Exhibit 11 to the Declaration of R.
15 Alexander Saveri dated January 11, 2018 (including but not limited to any communications by,
16 between, or among any directors, officers, or Employees of Group or Display related to such
17 Meetings).

18 **REQUEST NO. 11**

19 All documents that Wenkai Zhang reviewed or relied on in preparing his declaration.

20 **REQUEST NO. 12**

21 All documents identified or described in response to any of the interrogatories included in
22 Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of Interrogatories to Irico Group
23 Corporation and Irico Display Devices Co, Ltd., dated March 5, 2018.

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28 ///

1 DATED: March 5, 2018

2 By: /s/ R. Alexander Saveri

3 Guido Saveri
4 R. Alexander Saveri
5 Geoffrey C. Rushing
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18 *Attorneys for Defendants*
19 *IRICO GROUP CORP. and*
20 *IRICO DISPLAY DEVICES CO., LTD.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 IN RE: CATHODE RAY TUBE (CRT)
13 ANTITRUST LITIGATION

14 Case No. 3:07-cv-05944-JST

15 MDL No. 1917

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17
18 This Document Relates to:
19
20 ALL DIRECT PURCHASER ACTIONS

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**IRICO DEFENDANTS' OBJECTIONS
AND RESPONSES TO DIRECT
PURCHASER PLAINTIFF STUDIO
SPECTRUM, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTY: Direct Purchaser Plaintiff Studio Spectrum, Inc.

RESPONDING PARTIES: Irico Group Corporation
Irico Display Devices Co., Ltd.

SET NO.: One

1 Pursuant to Federal Rules of Civil Procedure 26 and 33, Irico Group Corporation and Irico
 2 Display Devices Co, Ltd. (collectively, "Irico" or "Irico Defendants") hereby respond to the
 3 Direct Purchaser Plaintiff Studio Spectrum, Inc.'s ("Plaintiff") First Set of Interrogatories
 4 ("Interrogatories"). Irico reserves the right to amend or supplement these Objections and
 5 Responses (the "Responses") to the extent allowed by the Federal Rules of Civil Procedure and
 6 the Local Rules of Practice in Civil Proceedings before the United States District Court for the
 7 Northern District of California ("Local Rules"). Subject to and without waiving any of Irico's
 8 General and Specific Objections as set forth below, Irico is willing to meet and confer with
 9 Plaintiff regarding such General and Specific Objections.

10 The following Responses are made only for purposes of this case. The Responses are
 11 subject to all objections as to relevance, materiality and admissibility, and to any and all
 12 objections on any ground that would require exclusion of any response if it were introduced in
 13 court. All evidentiary objections and grounds are expressly reserved.

14 These Responses are subject to the provisions of the Stipulated Protective Order that the
 15 Court issued on June 18, 2008 ("Protective Order"). Irico's Responses are hereby designated
 16 "Confidential" in accordance with the provisions of the Protective Order.

17 **GENERAL OBJECTIONS**

18 Irico makes the following General Objections to Plaintiff's Interrogatories:

19 1. Irico's Responses are based upon information available to and located by Irico as
 20 of the date of service of these Responses. In responding to Plaintiff's Interrogatories, Irico states
 21 that it has conducted, or will conduct, a diligent search, reasonable in scope, of those files and
 22 records in its possession, custody, or control believed to likely contain information responsive to
 23 Plaintiff's Interrogatories.

24 2. No express, incidental, or implied admissions are intended by these Responses and
 25 should not be read or construed as such.

26 3. Irico does not intend, and its Responses should not be construed as, an agreement
 27 or acquiescence with any characterization of fact, assumption, or conclusion of law contained in
 28 or implied by the Interrogatories.

1 4. To the extent that Irico responds to Plaintiff's Interrogatories by stating that Irico
 2 will produce or make available for examination responsive information or documents, Irico does
 3 not represent that any such information or documents exist. Irico will make a good faith and
 4 reasonable attempt to ascertain whether information responsive to Plaintiff's Interrogatories exists
 5 and is properly producible, and will produce or make available for examination non-privileged
 6 responsive materials to the extent any are located during the course of a reasonable search.

7 5. Irico objects to Plaintiff's Interrogatories to the extent that they are overly broad,
 8 unduly burdensome, oppressive, and duplicative to the extent that they seek information or
 9 documents that are already in the possession, custody, or control of Plaintiff.

10 6. Irico objects to Plaintiff's Interrogatories to the extent that they seek to impose
 11 obligations on Irico beyond those of the Federal Rules of Civil Procedure, the Local Rules, or any
 12 Order of this Court.

13 7. Irico objects to Plaintiff's Interrogatories to the extent they seek information that is
 14 not relevant to jurisdictional issues or disproportionate to the needs of the case in resolving such
 15 jurisdictional issues.

16 8. Irico objects to Plaintiff's Interrogatories to the extent that they are vague,
 17 ambiguous, or susceptible to more than one interpretation. Irico shall attempt to construe such
 18 vague or ambiguous Interrogatories so as to provide for the production of responsive information
 19 that is proportionate to the needs of the case. If Plaintiff subsequently asserts an interpretation of
 20 any Interrogatory that differs from Irico's understanding, Irico reserves the right to supplement or
 21 amend its Responses.

22 9. Irico objects to Plaintiff's Interrogatories to the extent that they contain terms that
 23 are insufficiently or imprecisely defined. Irico shall attempt to construe such vague or ambiguous
 24 Interrogatories so as to provide for the production of responsive information that is proportionate
 25 to the needs of the case.

26 10. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
 27 that is protected from disclosure by the attorney-client privilege, work product doctrine, joint
 28 defense or common interest privilege, self-evaluative privilege, or any other applicable privilege

1 or immunity. Irico will provide only information that it believes to be non-privileged and
 2 otherwise properly discoverable. None of Irico's responses is intended nor should be construed as
 3 a waiver of any such privilege or immunity. The inadvertent or mistaken provision of any
 4 information or responsive documents subject to any such doctrine, privilege, protection or
 5 immunity from production shall not constitute a general, inadvertent, implicit, subject-matter,
 6 separate, independent or other waiver of such doctrine, privilege, protection or immunity from
 7 production.

8 11. Irico objects to Plaintiff's Interrogatories to the extent that they call for
 9 information that is not in the possession, custody, or control of Irico. Irico also objects to the
 10 extent that any of Plaintiff's Interrogatories seek information from non-parties or third parties,
 11 including but not limited to any of Irico's subsidiary or affiliated companies.

12 12. Irico objects to Plaintiff's Interrogatories to the extent that responding would
 13 require Irico to violate the privacy and/or confidentiality of a third party or confidentiality
 14 agreement with a third party.

15 13. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
 16 that is publicly available, already in Plaintiffs' possession, custody, or control, or more readily
 17 available from other sources.

18 14. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
 19 or documents concerning transactions outside the United States. Such Interrogatories are unduly
 20 burdensome and irrelevant because they do not relate to actions by Irico in or causing a direct
 21 effect in the United States. Such Interrogatories are also unduly burdensome and irrelevant to this
 22 pending action as Plaintiffs' class definition is confined to "all persons . . . who directly
 23 purchased a Cathode Ray Tube Product . . . in the United States" (see Direct Purchaser Plaintiffs'
 24 Consolidated Amended Complaint).

25 15. Irico objects to Plaintiff's Interrogatories to the extent that compliance would
 26 require Irico to violate the laws, regulations, procedures, or orders of a judicial or regulatory body
 27 of foreign jurisdictions.

28

1 16. Irico's responses, whether now or in the future, pursuant to Plaintiff's
 2 Interrogatories should not be construed as either (i) a waiver of any of Irico's general or specific
 3 objections or (ii) an admission that such information or documents are either relevant or
 4 admissible as evidence.

5 17. Irico objects to Plaintiff's Interrogatories to the extent that compliance would
 6 require Irico to seek information stored on backup or archived databases or other systems that are
 7 not readily accessible or otherwise no longer active.

8 18. Irico objects to Plaintiff's Interrogatories to the extent that they are compound
 9 and/or contain discrete subparts in violation of Federal Rule of Civil Procedure 33(a)(1).

10 19. Irico objects to Plaintiff's Interrogatories to the extent that they state and/or call for
 11 legal conclusions.

12 20. Irico objects to the Interrogatories to the extent that they contain express or
 13 implied assumptions of fact or law with respect to the matters at issue in this case.

14 21. Irico reserves the right to assert additional General and Specific Objections as
 15 appropriate to supplement these Responses.

16 These General Objections apply to each Interrogatory as though restated in full in the
 17 responses thereto. The failure to mention any of the foregoing General Objections in the specific
 18 responses set forth below shall not be deemed as a waiver of such objections or limitations.

19 **GENERAL OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

20 1. Irico objects to the definitions of "You" and "Your" (Definition No. 6) to the
 21 extent that Plaintiff defines those terms to include the Irico's "predecessors, successors,
 22 subsidiaries, departments, divisions, and/or affiliates." This definition is legally incorrect,
 23 overbroad, unduly burdensome, vague, and ambiguous. Irico also objects to the inclusion of "all
 24 present and former directors, officers, Employees, agents, representatives or any Persons acting or
 25 purporting to act on behalf of" Irico within this definition to the extent it purports to encompass
 26 information that is protected by attorney-client privilege, work product protection or any other
 27 applicable doctrine, privilege, protection or immunity or otherwise calls for a legal conclusion.

1 2. Irico objects to the definition of “Document” (Definition No. 8) to the extent it
 2 seeks to impose requirements that are beyond those imposed by the Federal Rules of Civil
 3 Procedure, the Local Rules, or any other applicable laws.

4 3. Irico objects to the definition of “Employee” (Definition No. 9) on the grounds
 5 that it calls for a legal conclusion and is otherwise vague, ambiguous, and overly broad. Irico
 6 further objects to this definition to the extent that it attempts to impose burdens on Irico beyond
 7 those imposed by the Federal Rules of Civil Procedure. Irico further objects to this definition to
 8 the extent that it seeks information protected by the attorney client or other applicable privilege,
 9 attorney work product doctrine, or otherwise seeks to violate rights of privacy under U.S. or
 10 foreign law.

11 4. Irico objects to the definitions of “CRT” and “CRT Products” (Definitions No. 10
 12 and 11) on the grounds that they are vague, ambiguous and overly broad. Irico further objects to
 13 the use of the term “CRT Products” to the extent that it is inconsistent with the definition of
 14 “CRT Products” as set forth in Plaintiff’s pleadings.

15 5. Irico objects to the definition of the “Relevant Time Period” (Definition No. 12) as
 16 overbroad, unduly burdensome, beyond the applicable statute of limitations, and beyond the
 17 relevant time period for determining jurisdictional issues.

18 6. Irico objects to the definition of “Communication” (Definition No. 14) on the
 19 grounds that it is vague, ambiguous, and overly broad. Irico further objects to this definition to the
 20 extent that it attempts to impose burdens on Irico beyond those imposed by the Federal Rules of
 21 Civil Procedure.

22 7. Irico objects to the definition of “Meeting” (Definition No. 16) on the grounds that
 23 the definition is overly broad, unduly burdensome, and seeks information that is neither relevant
 24 nor proportionate to the needs of the case.

25 8. Irico objects to Instruction No. 1 (related to identification of persons) to the extent
 26 that it purports to impose burdens or obligations broader than, inconsistent with, or not authorized
 27 under the Federal Rules of Civil Procedure, including, without limiting the generality of the
 28 foregoing, Rule 26(b)(5)(A) and Rule 26(e)(1). Irico further objects to this Instruction to the

1 extent that it purports to impose burdens or obligations broader than, inconsistent with, or not
 2 authorized under, the Local Rules and any orders of the Court, and on the grounds that it is vague,
 3 ambiguous, and inconsistent with common usage. Irico further objects to this Instruction to the
 4 extent it seeks information that would disclose personal confidential information and/or violate
 5 any and all rights of privacy under the United States Constitution or Article I of the Constitution
 6 of the State of California, or any other applicable law or state constitution, or that is otherwise
 7 prohibited from disclosure because to do so would cause Irico to violate legal and/or contractual
 8 obligations to any other persons or entities.

9. Irico objects to Instruction No. 2 (related to identification of an entity other than a
 10 natural person) to the extent that it purports to impose burdens or obligations broader than,
 11 inconsistent with, or not authorized under the Federal Rules of Civil Procedure or other applicable
 12 rule or Order of this Court.

10. Irico objects to Instruction No. 3 (related to the production of business records in
 11 response to an interrogatory pursuant to Federal Rule of Civil Procedure 33(d)) on the grounds
 12 that it is unduly burdensome and purports to impose burdens and obligations upon Irico beyond
 13 those required by the Federal Rules of Civil Procedure or other applicable rule or Order of this
 14 Court.

SPECIFIC RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

20 Please describe in detail the circumstances surrounding Group's creation, including:

21 a. The identity of all Persons with knowledge of Group's creation; and
 22 b. The identity of all Documents that refer or relate to Group's creation.

RESPONSE TO INTERROGATORY NO. 1

24 Irico reasserts and incorporates each of the General Objections and Objections to the
 25 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 26 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 27 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.

28 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to

1 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
 2 the grounds that identification of “all Persons” and “all Documents” is overbroad, unduly
 3 burdensome, and disproportionate to the needs of the case. Irico also objects that this
 4 interrogatory seeks information that is publicly available.

5 Subject to and without waiving the objections stated above, Irico responds as follows:

6 Irico Group’s origins trace back to a decision by the State Council of the People’s
 7 Republic of China in the 1970s to fully fund and support the production of CRTs due to the
 8 strategic importance of CRTs in the development of China’s national economy. Given the
 9 significance of CRTs in the fields of communications, science, education, culture, medicine,
 10 industry, agriculture, and others, the Fourth Ministry of Machinery Industry reported to the State
 11 Council on February 17, 1977 that it intended to introduce CRT technology and equipment from
 12 abroad. This resulted in the construction of the wholly state-owned and state-funded Shaanxi
 13 Color CRT “4400” Plant in 1978 in Xianyang, which was classified as an industrial enterprise
 14 owned by the whole people of China. Irico Group was established on March 16, 1989 in
 15 Xianyang, Shaanxi Province with the approval of the Chinese Ministry of Machinery and
 16 Electronics Industry, and was formed out of the wholly state-owned assets of the Shaanxi Color
 17 CRT “4400” Plant. Group was established by the Chinese government to aid in China’s national
 18 economic development by responding to the need of the Chinese people for color televisions.
 19 Group’s approved scope of business was defined as the production of color picture tubes, display
 20 tubes, and ancillary components; the approved scope did not include any finished products such
 21 as televisions or computer monitors. Group received funding solely from the Chinese
 22 government.

23 Irico further states that Zhang Shaowen and Guo Mengquan have knowledge of this
 24 subject.

25 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
 26 00000904.

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 28

1 **INTERROGATORY NO. 2**

2 Please describe in detail the circumstances surrounding Display's creation, including:

3 a. The identity of all Persons with knowledge of Display's creation; and

4 b. The identity of all Documents that refer or relate to Display's creation.

5 **RESPONSE TO INTERROGATORY NO. 2**

6 Irico reasserts and incorporates each of the General Objections and Objections to the
 7 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 8 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 9 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 10 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
 11 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
 12 the grounds that identification of "all Persons" and "all Documents" is overbroad, unduly
 13 burdensome, and disproportionate to the needs of the case. Irico also objects that this
 14 interrogatory seeks information that is publicly available.

15 Subject to and without waiving the objections stated above, Irico responds as follows:

16 Irico Display was established in 1992 by Irico Group and wholly state-owned entities,
 17 Shaanxi ICBC Trust and Investment Corporation and Shaanxi PCBC Trust and Investment
 18 Corporation. Display had its domicile in Xianyang, Shaanxi Province. As a collaboration
 19 founded and held by three wholly state-owned entities and created with the approval of the
 20 Shaanxi Provincial Economic System Reform Committee, Display was set up as a wholly state-
 21 owned enterprise of the Chinese government. Display was tasked with the development,
 22 production, and sales of color picture displays, parts, and raw materials. Display's stated purpose
 23 was to make greater contributions to China's national economic development by satisfying the
 24 domestic need for CRT products.

25 Irico further states that Long Tao and Hou Ruijin have knowledge of this subject.

26 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
 27 00000904.

INTERROGATORY NO. 3

Please describe the direct ownership of Group from 2006 to 2008, including:

- a. The identity of all Persons with knowledge of Group's ownership from 2006 to 2008; and
- b. The identity of all Documents which refer or relate to Group's ownership from 2006 to 2008.

RESPONSE TO INTERROGATORY NO. 3

8 Irico reasserts and incorporates each of the General Objections and Objections to the
9 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
10 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
11 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
12 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
13 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
14 the grounds that identification of "all Persons" and "all Documents" is overbroad, unduly
15 burdensome, and disproportionate to the needs of the case. Irico also objects that this
16 interrogatory seeks information that is publicly available.

Subject to and without waiving the objections stated above, Irico responds as follows:

18 On November 26, 2007, Group was wholly owned by the State Council of the People's
19 Republic of China.

20 || Irico further states that Guo Mengquan has knowledge of this subject.

21 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
22 00000904.

INTERROGATORY NO. 4

Please describe the direct ownership of Display from 2006 to 2008, including:

- a. The identity of all Persons with knowledge of Display's ownership from 2006 to 2008; and
- b. The identity of all Documents which refer or relate to Display's ownership from 2006 to 2008.

1 **RESPONSE TO INTERROGATORY NO. 4**

2 Irico reasserts and incorporates each of the General Objections and Objections to the
 3 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 4 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 5 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 6 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
 7 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
 8 the grounds that identification of "all Persons" and "all Documents" is overbroad, unduly
 9 burdensome, and disproportionate to the needs of the case. Irico also objects that this
 10 interrogatory seeks information that is publicly available.

11 Subject to and without waiving the objections stated above, Irico responds as follows:

12 On November 26, 2007, Display was owned 41.36% by Irico Group Electronics Co., Ltd.
 13 ("Electronics"), which was in turn 75% owned by Group. The ten largest shareholders of Display
 14 in 2007 were as follows:

Display Shareholder as of November 26, 2007	Shares held
Irico Group Electronics Co., Ltd	41.36%
Zhejiang Lanshen Information Technology Investment Co., Ltd.	1.71%
Xi'an Yaxuan Trading Co., Ltd.	0.97%
Urumqi City Commercial Bank Co., Ltd.	0.45%
Xi'an Aircraft Industry (Group) Co., Ltd.	0.45%
Sinochem International Petroleum Co.	0.45%
Tao Xinxian	0.41%
Shaanxi Tak Industrial Co., Ltd.	0.36%
Shanghai Tiandi Technology Investment Development Co., Ltd.	0.33%
Wang Junying	0.33%

26 Display was classified by the Chinese State-owned Assets Supervision and Administration
 27 Commission ("SASAC") as a "state-owned holding company" in 2007 under Chinese law due to
 28 the government holding a controlling interest through Group and Electronics.

1 Irico further states that Long Tao and Yan Yunlong have knowledge of this subject.

2 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
3 00000904.

4 **INTERROGATORY NO. 5**

5 Please describe any status, obligations, and/or privileges that Group or Display had under
6 Chinese Law from 2006 to 2008 because of the alleged status of Group or Display as an agency,
7 instrumentality, and/or organ of China, including:

8 a. The identity of all Persons with knowledge of Group's or Display's special status,
9 obligations, and/or privileges under Chinese Law from 2006 to 2008; and
10 b. The identity of all Documents which refer or relate to Group's or Display's special
11 status, obligations, and/or privileges under Chinese Law from 2006 to 2008.

12 **RESPONSE TO INTERROGATORY NO. 5**

13 Irico reasserts and incorporates each of the General Objections and Objections to the
14 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
15 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
16 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
17 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
18 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
19 the grounds that identification of "all Persons" and "all Documents" is overbroad, unduly
20 burdensome, and disproportionate to the needs of the case. Irico also objects that this
21 interrogatory seeks information that is publicly available. Irico also objects that the terms
22 "status," "obligations," and "privileges" are vague and ambiguous, rendering this interrogatory
23 overbroad and unduly burdensome.

24 Subject to and without waiving the objections stated above, Irico responds as follows:

25 On November 26, 2007, Irico Group was a state-owned enterprise wholly owned and
26 funded by the State Council of the People's Republic of China. As such, Group was subject to the
27 direct management, supervision, and control by SASAC and other departments of the State
28 Council. Group undertook many public service obligations and benefited from substantial

1 government support—well beyond any obligations and benefits conferred on privately-owned
 2 corporations. All major operating activities, financial policies, and appointment or dismissals of
 3 senior executives were directly managed by the Chinese government.

4 SASAC’s control over Group was authorized by the Interim Regulations on Supervision
 5 and Management of State-owned Assets of Enterprises, adopted by the State Council in 2003 and
 6 in effect on November 26, 2007. Among other things, those regulations specified that SASAC
 7 shall: (1) perform responsibilities on behalf of the State as the sole investor in Group and
 8 safeguard the rights and interests of the state in the assets utilized by Group; (2) guide and push
 9 forward any reform or restructuring efforts by Group; (3) dispatch supervisory panels to Group;
 10 (4) appoint and remove the board of directors, General Manager, Deputy General Manager, Chief
 11 Accountant, and other “responsible persons” of Group; (5) evaluate the performance and set the
 12 compensation of board members and management of Group, including rewarding good
 13 performance and punishing poor performance; (6) supervise and perform regular audits to ensure
 14 the preservation and appreciation of the value of state-owned assets held by Group; (7) review
 15 and approve any restructuring plans and articles of association; (8) handle any merger or
 16 bankruptcy events affecting Group and make arrangements for laid-off workers; (9) authorize
 17 operation of any state-owned assets by Group and its subsidiaries; and (10) receive regular reports
 18 from Group on its finances, production, and operations as well as the preservation or appreciation
 19 of state-owned assets. Any directors, managers, and other “responsible persons” of Group are
 20 subject to disciplinary sanctions—including removal, disqualification from any future leadership
 21 positions at state-owned enterprises, and potential criminal liability—for actions causing a loss of
 22 State-owned assets.

23 In addition to these regulations, Group was required to refer any investment activities and
 24 major asset or property rights transfers to the State Council for approval. Group was obligated to
 25 achieve performance targets for maintenance and appreciation of State-owned assets in
 26 accordance with government requirements. Group received all of its capital funding from the
 27 Chinese government; its budget was set annually by SASAC and the Chinese Ministry of
 28 Finance, consisting of government funds appropriated to Group for various purposes, including

1 specific projects to improve Display's operations. Group's finances were monitored directly by
 2 the Ministry of Finance, and Group was obligated to pay a set portion of its after-tax profits back
 3 to the government. The government also delegated the provision of numerous public services to
 4 Group, including a school system, police department, hospital, and senior living center, set up in
 5 Xianyang, Shaanxi Province.

6 Irico Display was registered as and held the status of a "state-owned holding company" in
 7 2007. That term is defined under Chinese law to include entities partially owned by the Chinese
 8 government, over which the government exercises control. As a state-owned holding company,
 9 Irico Display also enjoyed many benefits and was subject to responsibilities that did not apply to
 10 non-state-owned corporations. Display was subject to direct supervision by SASAC as authorized
 11 by the Interim Regulations described above. Under those regulations, SASAC was authorized to:
 12 (1) appoint representatives to Display shareholder meetings to exercise authority as the
 13 controlling shareholder under SASAC's instructions; (2) nominate the Chairman and other
 14 directors to Display's board of directors to act according to SASAC's instructions; (3) nominate
 15 the Chairman and other members of Display's supervisory panel; (4) nominate top management
 16 of Display, including the General Manager, Deputy General Manager, and Chief Accountant; (5)
 17 direct Display (and other companies under Irico Group) in reform, restructuring, and other efforts
 18 to adjust corporate governance in accordance with State Council policy; (6) supervise the
 19 financial situation of Display in order to safeguard the state's interest in its state-owned assets; (7)
 20 establish guidelines for executive and employee compensation; and (8) evaluate the performance
 21 of top Display directors and management it has appointed. As with Group, any directors,
 22 managers, and other "responsible persons" for Display are subject to disciplinary sanctions,
 23 including potential criminal liability, for actions causing a loss of state-owned assets. Under
 24 these regulations, Display was commanded to "accept the supervision and administration
 25 conducted by" SASAC. Display also benefited from special guidance and coordination from
 26 SASAC in overcoming business difficulties and solving problems in the process of their reform
 27 and development.

28

1 In addition to the obligations and privileges set forth in these regulations, Display was
 2 subject to other requirements and received other forms of government support. Major production
 3 changes by Display, such as new assembly lines and equipment, required direct approval by the
 4 Economics and Trade Committee of Shaanxi Province. Display needed approval from SASAC
 5 and the Shaanxi Province state-owned asset supervision authorities for its initial public offering.
 6 Display also received significant financial support from SASAC and the Ministry of Finance,
 7 including all of its initial funding at the time of formation, and periodic investments allocated by
 8 SASAC through Group for use by Display, in particular for capital projects, including for its thin-
 9 film-transistor liquid-crystal display project in 2007. Display was at all times subject to the
 10 absolute control of Group, and thus control by the Chinese government, in all its business
 11 activities, financial policies, and appointment of management. Group was listed as the “actual
 12 controller” of Display pursuant to Article 217(3) of the 2006 Chinese Company Law, which
 13 defines the term as “a person who is able practically to govern the behavior of a company through
 14 investment relations, agreements or other arrangements, although the person is not a shareholder
 15 of the company.” Display was required to submit regular financial, operational, and investment
 16 reports to Group for approval. Display also benefitted from the public services delegated to
 17 Group by the Chinese government, including a school system, police department, hospital, and
 18 senior living center, set up around Display’s operations in Xianyang, Shaanxi Province.

19 Irico further states that Long Tao and Guo Mengquan have knowledge of this subject.

20 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
 21 00000904.

22 **INTERROGATORY NO. 6**

23 Please describe any Chinese government supervision of Group from 2006 to 2008,
 24 including:

- 25 a. The identity (including government job title) of any Chinese officials involved in
 such supervision;
- 27 b. The identity of all Documents referring or relating to such supervision; and
- 28 c. The identity of other Persons with knowledge of such supervision.

1 **RESPONSE TO INTERROGATORY NO. 6**

2 Irico reasserts and incorporates each of the General Objections and Objections to the
 3 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 4 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 5 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 6 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
 7 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
 8 the grounds that identification of "any Chinese officials," "all Persons," and "all Documents" is
 9 overbroad, unduly burdensome, and disproportionate to the needs of the case. Irico also objects
 10 that this interrogatory seeks information that is publicly available. Irico also objects that the term
 11 "supervision" is vague and ambiguous, rendering this interrogatory overbroad and unduly
 12 burdensome.

13 Subject to and without waiving the objections stated above, Irico responds as follows:

14 See Irico's response above to Interrogatory No. 5. As a wholly state-owned enterprise as
 15 of November 26, 2007, Group was subject to supervision by SASAC and other departments of the
 16 State Council of the People's Republic of China in various aspects of its business, including
 17 finance, operations, and personnel management including its board of directors and senior
 18 management.

19 Irico further states that Long Tao and Guo Mengquan have knowledge of this subject.

20 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
 21 00000904.

22 **INTERROGATORY NO. 7**

23 Please describe any Chinese government supervision of Display from 2006 to 2008,
 24 including:

25 a. The identity (including government job title) of any Chinese officials involved in
 26 such supervision;

27 b. The identity of all Documents referring or relating to such supervision; and

28 c. The identity of other Persons with knowledge of such supervision.

RESPONSE TO INTERROGATORY NO. 7

2 Irico reasserts and incorporates each of the General Objections and Objections to the
3 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
4 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
5 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
6 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
7 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
8 the grounds that identification of “any Chinese officials,” “all Persons,” and “all Documents” is
9 overbroad, unduly burdensome, and disproportionate to the needs of the case. Irico also objects
10 that this interrogatory seeks information that is publicly available. Irico also objects that the term
11 “supervision” is vague and ambiguous, rendering this interrogatory overbroad and unduly
12 burdensome.

13 Subject to and without waiving the objections stated above, Irico responds as follows:

See Irico's response to Interrogatory Nos. 5 and 6. As a state-owned holding company as defined under Chinese law as of November 26, 2007, Display was subject both to supervision by SASAC and management and supervision by the government through Group, which held absolute control over Display's operations, finances, and personnel.

18 Irico further states that Long Tao and Guo Mengquan have knowledge of this subject.

19 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
20 00000904.

INTERROGATORY NO. 8

22 Describe the role, if any, that Irico Group Electronics Co., Ltd. played in the management
23 and/or supervision of Display from 2006 to 2008, including:

24 a. The identity of all Persons with knowledge of such management and/or
25 supervision; and
26 b. The identity of all Documents which refer or relate to such management and/or
27 supervision.

RESPONSE TO INTERROGATORY NO. 8

2 Irico reasserts and incorporates each of the General Objections and Objections to the
3 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
4 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
5 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
6 Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to
7 the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory on
8 the grounds that identification of “all Persons” and “all Documents” is overbroad, unduly
9 burdensome, and disproportionate to the needs of the case. Irico also objects that this
10 interrogatory seeks information that is publicly available. Irico also objects that the terms
11 “management” and “supervision” are vague and ambiguous, rendering this interrogatory
12 overbroad and unduly burdensome.

13 Subject to and without waiving the objections stated above, Irico responds as follows:

14 Irico Group Electronics Co., Ltd. was established on September 10, 2004, under the
15 approval of SASAC. As of November 26, 2007, Group held 75% of the shares of Electronics and
16 maintained absolute control over Electronics. The directors, supervisors, and senior executives of
17 Electronics were all determined by the Chinese government through Group. Group, under
18 Chinese government control and as the “actual controller” of Display as defined under the 2006
19 Chinese Company Law, also determined the directors, supervisors, and senior executives of
20 Display, directing Electronics to perform appointment and dismissal procedures on its behalf.

21 Irico further states that Zhu Xiaohang and Guo Mengquan have knowledge of this subject.

22 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
23 00000904.

INTERROGATORY NO. 9

25 Please describe with particularity all investigation or collection of information that
26 Wenkai Zhang performed in connection with the preparation of his declaration, including:

27 a. The identity of all Employees, officers or agents of Irico with whom he
28 communicated (whether oral or written) in connection with his declaration; and

1 b. The identity of all Documents he reviewed in connection with his declaration.

2 **RESPONSE TO INTERROGATORY NO. 9**

3 Irico reasserts and incorporates each of the General Objections and Objections to the
 4 Definitions and Instructions set forth above. Irico further objects that this request seeks
 5 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 6 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
 7 Compel. Mr. Zhang's declaration is no longer at issue, because his declaration was submitted in
 8 support of Irico's Motion to Set Aside Default, which the Court has already decided. Irico also
 9 objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of
 10 the case in resolving jurisdictional issues. Irico also objects that this request calls for information
 11 and documents that are privileged under the attorney-client privilege and work product doctrine.
 12 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 13 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

14 **INTERROGATORY NO. 10**

15 Explain with particularity the basis for Your contention that Group was managed directly
 16 by the Chinese government (or a political subdivision thereof) through the filing of the original
 17 complaint herein, including:

18 a. The identity of all Persons with knowledge of such management; and
 19 b. The identity of all Documents which refer or relate to such management.

20 **RESPONSE TO INTERROGATORY NO. 10**

21 Irico reasserts and incorporates each of the General Objections and Objections to the
 22 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 23 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 24 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 25 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 26 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.
 27 Irico also objects that this interrogatory seeks information that is publicly available. Irico also
 28 objects that the term "managed" is vague and ambiguous, rendering this interrogatory overbroad

1 and unduly burdensome.

2 Subject to and without waiving the objections stated above, Irico responds as follows:

3 See Irico's responses to Interrogatory Nos. 5 and 6.

4 **INTERROGATORY NO. 11**

5 Please describe with particularity the basis for the contention, as stated in paragraph 7 of
6 the Zhang Declaration, that "Irico Group's management, including its Legal Representative and
7 General Manager, was appointed directly . . . by the SASAC after 2003," including:

- 8 a. The identity of all Persons with knowledge of the appointment of Group's
9 management; and
- 10 b. The identity of all Documents which refer or relate to the appointment of Group's
11 management.

12 **RESPONSE TO INTERROGATORY NO. 11**

13 Irico reasserts and incorporates each of the General Objections and Objections to the
14 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
15 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
16 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
17 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
18 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

19 Subject to and without waiving the objections stated above, Irico responds as follows:

20 See Irico's responses to Interrogatory Nos. 5 and 6.

21 **INTERROGATORY NO. 12**

22 Please describe with particularity the basis for the contention, as stated in paragraph 8 of
23 the Zhang Declaration, that "[a]t the time the DPP's original complaint was filed on
24 November 26, 2007, Irico Display was a State-owned holding company," including:

- 25 a. The identity of all Persons with knowledge of the basis for the contention; and
- 26 b. The identity of all Documents sufficient to support that contention.

27 **RESPONSE TO INTERROGATORY NO. 12**

28 Irico reasserts and incorporates each of the General Objections and Objections to the

1 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 2 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 3 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 4 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 5 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

6 Subject to and without waiving the objections stated above, Irico responds as follows:

7 See Irico's responses to Interrogatory Nos. 4 through 7.

8 **INTERROGATORY NO. 13**

9 Please describe with particularity the basis for the contention, as stated in paragraph 8 of
 10 the Zhang Declaration, that "Irico Display's management was appointed by the State
 11 Council-appointed management of Irico Group and reviewed by Irico Display's shareholders,"
 12 including:

- 13 a. The identity of all Persons with knowledge of the appointment of Display's
 14 management; and
- 15 b. The identity of all Documents which refer or relate to the appointment of Display's
 16 management.

17 **RESPONSE TO INTERROGATORY NO. 13**

18 Irico reasserts and incorporates each of the General Objections and Objections to the
 19 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 20 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 21 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 22 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 23 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

24 Subject to and without waiving the objections stated above, Irico responds as follows:

25 See Irico's responses to Interrogatory Nos. 4 through 8.

26 **INTERROGATORY NO. 14**

27 Please describe with particularity the basis for the contention, as stated in paragraph 8 of
 28 the Zhang Declaration, that "Irico Display's management was subject to the same regulations that

1 apply to state officials,” including:

2 a. The identity of all Persons with knowledge of the basis for the contention; and

3 b. The identity of all Documents supporting the contention.

4 **RESPONSE TO INTERROGATORY NO. 14**

5 Irico reasserts and incorporates each of the General Objections and Objections to the
 6 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 7 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 8 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
 9 Irico also objects to this interrogatory on the grounds that identification of “all Persons” and “all
 10 Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case.

11 Subject to and without waiving the objections stated above, Irico responds as follows:

12 See Irico’s response to Interrogatory No. 5. The management of Irico Display and its
 13 subsidiaries, as senior management of state-controlled companies, are regarded as performing
 14 official state duties under Chinese law. As such, Display’s management is subject to the Chinese
 15 government’s mandates for the integrity of state officials, relevant government anti-corruption
 16 provisions, and supervision by the state Commission for Discipline Inspection. As described in
 17 Irico’s response to Interrogatory No. 5, SASAC regulations specify that Display’s directors,
 18 management, and other “responsible persons” are subject to disciplinary sanction and are liable to
 19 compensate the State for any loss of State-owned assets caused by abuse of power or neglect of
 20 duty. In addition, Article 93 of the Chinese Criminal Law stipulates that “people engaged in
 21 official duties in state-owned companies, enterprises, institutions, and people’s organizations, and
 22 those who shall be assigned to non-state-owned companies, enterprises, institutions, and social
 23 organizations from state-owned companies, enterprises, institutions, and other persons who are
 24 engaged in official duties in accordance with the law, shall be treated as state functionaries.” A
 25 Notice issued by the Supreme People’s Court and Supreme People’s Procuratorate of China (the
 26 highest Chinese court and prosecuting authority, respectively) clarified that the top management
 27 in state-owned holding companies such as Display are considered state functionaries under this
 28 law. For example, between 2013 and 2015, three managers of a subsidiary of Display were tried

1 as public officials and convicted for accepting bribes during the course of their duties.

2 Irico further states that Yan Yunlong has knowledge of this subject.

3 Irico further refers Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-
4 00000904.

5 **INTERROGATORY NO. 15**

6 Please describe with particularity the basis for the contention, as stated in paragraph 9 of
7 the Zhang Declaration, that “Irico Display was managed directly by the State Council-appointed
8 management of Irico Group and indirectly by the Ministry of Industry and Information
9 Technology of the State Council,” including:

10 a. The identity of all Persons with knowledge of the basis for the contention; and
11 b. The identity of all Documents supporting the contention.

12 **RESPONSE TO INTERROGATORY NO. 15**

13 Irico reasserts and incorporates each of the General Objections and Objections to the
14 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
15 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
16 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
17 Irico also objects to this interrogatory on the grounds that identification of “all Persons” and “all
18 Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case.

19 Subject to and without waiving the objections stated above, Irico responds as follows:

20 See Irico’s responses to Interrogatory Nos. 5 through 8.

21 **INTERROGATORY NO. 16**

22 Please describe with particularity the basis for the contention, as stated in paragraph 9 of
23 the Zhang Declaration, that “Irico Group directly appointed the management of Irico Display,”
24 including:

25 a. The identity of all Persons with knowledge of the basis for the contention; and
26 b. The identity of all Documents supporting the contention.

1 **RESPONSE TO INTERROGATORY NO. 16**

2 Irico reasserts and incorporates each of the General Objections and Objections to the
 3 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 4 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 5 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 6 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 7 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

8 Subject to and without waiving the objections stated above, Irico responds as follows:

9 See Irico's responses to Interrogatory Nos. 5 through 8.

10 **INTERROGATORY NO. 17**

11 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
 12 the Zhang Declaration, that "[a]ny major business decisions or transactions entered into or
 13 contemplated by Irico Display required review and approval by Irico Group and/or the Ministry
 14 of Industry and Information Technology of the State Council, or another appropriate department
 15 of the State Council," including:

16 a. The identity of all Persons with knowledge of the basis for the contention; and
 17 b. The identity of all Documents which support the contention.

18 **RESPONSE TO INTERROGATORY NO. 17**

19 Irico reasserts and incorporates each of the General Objections and Objections to the
 20 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 21 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 22 that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel.
 23 Irico also objects to this interrogatory on the grounds that identification of "all Persons" and "all
 24 Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case.

25 Subject to and without waiving the objections stated above, Irico responds as follows:

26 See Irico's responses to Interrogatory Nos. 5, 6, and 7.

1 **INTERROGATORY NO. 18**

2 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
 3 the Zhang Declaration, that “Irico Display was required to submit financial statements and reports
 4 about operating activities and investments to Irico Group for review,” including:

5 a. The identity of all Persons with knowledge of the basis for the contention; and
 6 b. The identity of all Documents which support the contention.

7 **RESPONSE TO INTERROGATORY NO. 18**

8 Irico reasserts and incorporates each of the General Objections and Objections to the
 9 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 10 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 11 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
 12 Irico also objects to this interrogatory on the grounds that identification of “all Persons” and “all
 13 Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case.

14 Subject to and without waiving the objections stated above, Irico responds as follows:

15 See Irico’s responses to Interrogatory Nos. 5, 6 and 7.

16 **INTERROGATORY NO. 19**

17 Please describe with particularity the basis for the contention, as stated in paragraph 10 of
 18 the Zhang Declaration, that “[f]or some matters beyond Irico Group’s authority—including
 19 (1) material investments by Irico Display, (2) mergers and acquisitions by Irico Display, (3) sale
 20 of shares resulting in a change in control over the company, (4) declaration of bankruptcy or
 21 cessation of operations by Irico Display, (5) financing, including issuance of stocks and bonds,
 22 and (6) proposed budgets—Irico Group had to obtain approval from the relevant agency of the
 23 State Council in order for Irico Display to take such action” and “[t]hus, Irico Display’s business
 24 and operations were controlled and supervised by Irico Group, as well as the relevant departments
 25 of the State Council,” including:

26 a. The identity of all Persons with knowledge of the basis for the contention;
 27 b. The identity of all Documents which support the contention; and

1 c. All instances in which approval was sought from, granted or denied in whole or in
 2 part by the “relevant agency of the State Council.”

3 **RESPONSE TO INTERROGATORY NO. 19**

4 Irico reasserts and incorporates each of the General Objections and Objections to the
 5 Definitions and Instructions set forth above. Irico further objects that this interrogatory seeks
 6 information beyond the scope of what is relevant to resolving jurisdictional issues and beyond
 7 that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel.
 8 Irico also objects to this interrogatory on the grounds that identification of “all Persons,” “all
 9 Documents,” and “all instances” is overbroad, unduly burdensome, and disproportionate to the
 10 needs of the case.

11 Subject to and without waiving the objections stated above, Irico responds as follows:

12 See Irico’s responses to Interrogatory Nos. 5, 6 and 7.

13 **INTERROGATORY NO. 20**

14 Please describe with particularity Irico’s sales and marketing of CRT Products in the
 15 United States during the Class Period, and/or attempts to sell or market any CRT Products in the
 16 United States during the Class Period, including:

17 a. The identity of all Persons with knowledge of such sales and marketing and/or
 18 attempts to sell or market CRT Products in the United States; and
 19 b. The identity of all Documents referring or relating to such sales and marketing
 20 and/or attempts to sell or market CRT Products in the United States.

21 **RESPONSE TO INTERROGATORY NO. 20**

22 Irico reasserts and incorporates each of the General Objections and Objections to the
 23 Definitions and Instructions set forth above. Irico further objects that this request seeks
 24 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 25 and beyond that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to
 26 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 27 disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to
 28 this interrogatory on the grounds that identification of “all Persons” and “all Documents” is

1 overbroad, unduly burdensome, and disproportionate to the needs of the case.

2 Subject to and without waiving these objections and pursuant to Federal Rule of Civil
 3 Procedure 33(d), Irico will produce or make available for inspection business records from which
 4 the answer to this Interrogatory may be determined.

5 Irico further states that Guo Menquan and Long Tao have knowledge of this subject.

6 **INTERROGATORY NO. 21**

7 Please describe with particularity the basis for the contention, as stated in the Reply Brief
 8 of Irico in Support of Motion to Set Aside Default (ECF No. 5229), that “the pricing activity that
 9 DPPs allege to result from illegal conduct was mandated by the Chinese government,” including:

10 a. The identity of all Persons with knowledge of the basis for the contention; and
 11 b. The identity of all Documents which support the contention.

12 **RESPONSE TO INTERROGATORY NO. 21**

13 Irico reasserts and incorporates each of the General Objections and Objections to the
 14 Definitions and Instructions set forth above. Irico further objects that this request seeks
 15 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 16 and beyond that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to
 17 Compel. Irico also objects to this interrogatory on the grounds that identification of “all Persons”
 18 and “all Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the
 19 case.

20 Dated: May 4, 2018

21
 22 */s/ Stuart C. Plunkett*
 23 Stuart C. Plunkett (State Bar No. 187971)
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8
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10
11 *Attorneys for Defendants*
12 *IRICO GROUP CORP. and*
13 *IRICO DISPLAY DEVICES CO., LTD.*

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CERTIFICATE OF SERVICE

In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917

I declare that I am employed in the County of San Francisco, California. I am over the age of eighteen years and not a party to the within case; my business address is: Baker Botts LLP, 101 California Street, Suite 3600, San Francisco, CA 94111.

On May 4, 2018, I served the following document(s) described as:

IRICO DEFENDANTS' OBJECTIONS AND RESPONSES TO DIRECT PURCHASER PLAINTIFF STUDIO SPECTRUM, INC.'S FIRST SET OF INTERROGATORIES

on the following interested parties in this action:

Guido Saveri (guido@saveri.com)
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Lead Counsel for the Direct Purchaser Plaintiffs

Lead Counsel for the Indirect Purchaser Plaintiffs

[] (BY OVERNIGHT DELIVERY) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I placed the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

[] (BY MAIL) by placing a true copy thereof in a sealed envelope with postage fully prepaid and addressed to the persons at the addresses as shown above. I am readily familiar with the business practice of Baker Botts LLP for collection and processing of correspondence for mailing with the United States Postal Service, and the correspondence would be deposited with United States Postal Service that same day in the ordinary course of business.

[X] (BY ELECTRONIC MAIL) I caused such documents to be sent to the persons at the email addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 4, 2018, 2012 at San Francisco, California.

/s/ *Stephanie DM Pearson*
Stephanie DM Pearson

VERIFICATION

I, Yunlong Yan, am General Counsel of Irico Group Corporation. I verify under penalty of perjury and based on reasonable inquiry, that the answers set forth in **IRICO DEFENDANTS' OBJECTIONS AND RESPONSES TO DIRECT PURCHASER PLAINTIFF STUDIO SPECTRUM, INC.'S FIRST SET OF INTERROGATORIES** are true and correct to the best of my knowledge, information and belief.

Executed on May 18, 2018


Yunlong Yan
General Counsel
Irico Group Corporation



EXHIBIT 4

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*Attorneys for Defendants
IRICO GROUP CORP. and
IRICO DISPLAY DEVICES CO., LTD.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
(N.D. Cal.)

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

IRICO DEFENDANTS' OBJECTIONS AND RESPONSES TO DIRECT PURCHASER PLAINTIFF STUDIO SPECTRUM, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

PROPOUNDING PARTY:

Direct Purchaser Plaintiff Studio Spectrum, Inc.

RESPONDING PARTIES:

Irico Group Corporation Irico Display Devices Co., Ltd.

SET NO.:

One

1 Pursuant to Federal Rules of Civil Procedure 26 and 34, Irico Group Corporation and Irico
 2 Display Devices Co, Ltd. (collectively, "Irico" or "Irico Defendants") hereby responds to the
 3 Direct Purchaser Plaintiff Studio Spectrum, Inc.'s ("Plaintiff") First Set of Requests for
 4 Production of Documents ("Requests"). Irico reserves the right to amend or supplement these
 5 Objections and Responses (the "Responses") to the extent allowed by the Federal Rules of Civil
 6 Procedure and the Local Rules of Practice in Civil Proceedings before the United States District
 7 Court for the Northern District of California ("Local Rules"). Subject to and without waiving any
 8 of Irico's General and Specific Objections as set forth below, Irico is willing to meet and confer
 9 with Plaintiff regarding such General and Specific Objections.

10 The following Responses are made only for purposes of this case. The Responses are
 11 subject to all objections as to relevance, materiality and admissibility, and to any and all
 12 objections on any ground that would require exclusion of any response if it were introduced in
 13 court. All evidentiary objections and grounds are expressly reserved.

14 These Responses are subject to the provisions of the Stipulated Protective Order that the
 15 Court issued on June 18, 2008 ("Protective Order"). Irico's Responses are hereby designated
 16 "Confidential" in accordance with the provisions of the Protective Order.

17 **GENERAL OBJECTIONS**

18 Irico makes the following General Objections to Plaintiff's Requests:

19 1. Irico's Responses are based upon information available to and located by Irico as
 20 of the date of service of these Responses. In responding to Plaintiff's Requests, Irico states that it
 21 has conducted, or will conduct, a diligent search, reasonable in scope, of those files and records in
 22 its possession, custody, or control believed to likely contain information responsive to Plaintiff's
 23 Requests.

24 2. No express, incidental, or implied admissions are intended by these Responses and
 25 should not be read or construed as such.

26 3. Irico does not intend, and its Responses should not be construed as, an agreement
 27 or acquiescence with any characterization of fact, assumption, or conclusion of law contained in
 28 or implied by the Requests.

1 4. To the extent that Irico responds to Plaintiff's Requests by stating that Irico will
 2 produce or make available for examination responsive information or documents, Irico does not
 3 represent that any such information or documents exist. Irico will make a good faith and
 4 reasonable attempt to ascertain whether information responsive to Plaintiff's Requests exists and
 5 is properly producible, and will produce or make available for examination non-privileged
 6 responsive materials to the extent any are located during the course of a reasonable search.

7 5. Irico objects to Plaintiff's Requests to the extent that they are overly broad, unduly
 8 burdensome, oppressive, and duplicative to the extent that they seek information or documents
 9 that are already in the possession, custody, or control of Plaintiff.

10 6. Irico objects to Plaintiff's Requests to the extent that they seek to impose
 11 obligations on Irico beyond those of the Federal Rules of Civil Procedure, the Local Rules, or any
 12 Order of this Court.

13 7. Irico objects to Plaintiff's Requests to the extent they seek information or
 14 documents that are not relevant to jurisdictional issues or disproportionate to the needs of the case
 15 in resolving such jurisdictional issues.

16 8. Irico objects to Plaintiff's Requests to the extent that they are vague, ambiguous,
 17 or susceptible to more than one interpretation. Irico shall attempt to construe such vague or
 18 ambiguous Requests so as to provide for the production of responsive information or documents
 19 that are proportionate to the needs of the case. If Plaintiff subsequently asserts an interpretation of
 20 any Request that differs from Irico's understanding, Irico reserves the right to supplement or
 21 amend its Responses.

22 9. Irico objects to Plaintiff's Requests to the extent that they contain terms that are
 23 insufficiently or imprecisely defined. Irico shall attempt to construe such vague or ambiguous
 24 Requests so as to provide for the production of responsive information or documents that are
 25 proportionate to the needs of the case.

26 10. Irico objects to Plaintiff's Requests to the extent that they seek information or
 27 documents that are protected from disclosure by the attorney-client privilege, work product
 28 doctrine, joint defense or common interest privilege, self-evaluative privilege, or any other

1 applicable privilege or immunity. Irico will provide only information that it believes to be non-
 2 privileged and otherwise properly discoverable. None of Irico's responses is intended nor should
 3 be construed as a waiver of any such privilege or immunity. The inadvertent or mistaken
 4 provision of any information or responsive documents subject to any such doctrine, privilege,
 5 protection or immunity from production shall not constitute a general, inadvertent, implicit,
 6 subject-matter, separate, independent or other waiver of such doctrine, privilege, protection or
 7 immunity from production.

8 11. Irico objects to Plaintiff's Requests to the extent that they call for information or
 9 documents that are not in the possession, custody, or control of Irico. Irico also objects to the
 10 extent that any of Plaintiff's Requests seek information from non-parties or third parties,
 11 including but not limited to any of Irico's subsidiary or affiliated companies.

12 12. Irico objects to Plaintiff's Requests to the extent that responding would require
 13 Irico to violate the privacy and/or confidentiality of a third party or confidentiality agreement
 14 with a third party.

15 13. Irico objects to Plaintiff's Requests to the extent that they seek information or
 16 documents that are publicly available, already in Plaintiffs' possession, custody, or control, or
 17 more readily available from other sources.

18 14. Irico objects to Plaintiff's Requests to the extent that they seek information or
 19 documents concerning transactions outside the United States. Such Requests are unduly
 20 burdensome and irrelevant because they do not relate to actions by Irico in or causing a direct
 21 effect in the United States. Such Requests are also unduly burdensome and irrelevant to this
 22 pending action as Plaintiffs' class definition is confined to "all persons . . . who directly
 23 purchased a Cathode Ray Tube Product . . . in the United States" (see Direct Purchaser Plaintiffs'
 24 Consolidated Amended Complaint).

25 15. Irico objects to Plaintiff's Requests to the extent that compliance would require
 26 Irico to violate the laws, regulations, procedures, or orders of a judicial or regulatory body of
 27 foreign jurisdictions.

1 16. Irico's responses, whether now or in the future, pursuant to Plaintiff's Requests
 2 should not be construed as either (i) a waiver of any of Irico's general or specific objections or (ii)
 3 an admission that such information or documents are either relevant or admissible as evidence.

4 17. Irico objects to Plaintiff's Requests to the extent that compliance would require
 5 Irico to seek information or documents stored on backup or archived databases or other systems
 6 that are not readily accessible or otherwise no longer active.

7 18. Irico objects to Plaintiff's Requests to the extent that they state and/or call for legal
 8 conclusions.

9 19. Irico objects to the Requests to the extent that they contain express or implied
 10 assumptions of fact or law with respect to the matters at issue in this case.

11 20. Irico objects to the Requests to the extent they seek documents that cannot be
 12 removed or transmitted outside China without violating the laws and regulations of that country,
 13 including but not limited to restrictions on the transmission of state secrets or trade secrets as
 14 those terms are defined under Chinese law.

15 21. Irico reserves the right to assert additional General and Specific Objections as
 16 appropriate to supplement these Responses.

17 These General Objections apply to each Interrogatory as though restated in full in the
 18 responses thereto. The failure to mention any of the foregoing General Objections in the specific
 19 responses set forth below shall not be deemed as a waiver of such objections or limitations.

GENERAL OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

21 1. Irico objects to the definition of "Communication" (Definition No. 3) on the
 22 grounds that it is vague, ambiguous, and overly broad. Irico further objects to this definition to the
 23 extent that it attempts to impose burdens on Irico beyond those imposed by the Federal Rules of
 24 Civil Procedure.

25 2. Irico objects to the definitions of "Document" (Definition No. 8) and
 26 "Electronically stored information" (Definition No. 9) to the extent they seek to impose
 27 requirements that are beyond those imposed by the Federal Rules of Civil Procedure, the Local
 28 Rules, or any other applicable laws.

1 3. Irico objects to the definition of “Employee” (Definition No. 10) on the grounds
 2 that it calls for a legal conclusion and is otherwise vague, ambiguous, and overly broad. Irico
 3 further objects to this definition to the extent that it attempts to impose burdens on Irico beyond
 4 those imposed by the Federal Rules of Civil Procedure. Irico further objects to this definition to
 5 the extent that it seeks information protected by the attorney client or other applicable privilege,
 6 attorney work product doctrine, or otherwise seeks to violate rights of privacy under U.S. or
 7 foreign law.

8 4. Irico objects to the definition of “Meeting” (Definition No. 12) on the grounds that
 9 the definition is overly broad, unduly burdensome, and seeks information or documents that are
 10 neither relevant nor proportionate to the needs of the case.

11 5. Irico objects to the definition of “relating to,” “regarding,” and “with respect to”
 12 (Definition No. 15) to the extent that such terms seek the discovery of information or documents
 13 that are disproportionate to the needs of the case in determining jurisdictional issues. Irico further
 14 objects to these terms to the extent that they seek to improperly expand the scope of information
 15 or documents relevant to the issues set forth in Plaintiff’s pleadings. Irico also objects to these
 16 definitions because responding to such vague, overly broad, and ambiguous Requests would be
 17 unduly burdensome.

18 6. Irico objects to the definitions of “You” and “Your” (Definition No. 16) to the
 19 extent that Plaintiff defines those terms to include the Irico’s “predecessors, successors,
 20 subsidiaries, departments, divisions, and/or affiliates.” This definition is legally incorrect,
 21 overbroad, unduly burdensome, vague, and ambiguous. Irico also objects to the inclusion of “all
 22 present and former directors, officers, Employees, agents, representatives or any Persons acting or
 23 purporting to act on behalf of” Irico within this definition to the extent it purports to encompass
 24 information or documents that are protected by attorney-client privilege, work product protection
 25 or any other applicable doctrine, privilege, protection or immunity or otherwise calls for a legal
 26 conclusion.

27 7. Irico objects to the definition of the “Relevant Time Period” (Definition No. 17) as
 28 overbroad, unduly burdensome, beyond the applicable statute of limitations, and beyond the

1 relevant time period for determining jurisdictional issues.

2 8. Irico objects to the definition of "CRT" (Definition No. 19) on the grounds that it
3 is vague, ambiguous and overly broad.

4 9. Irico objects to Instruction No. 1 as overly broad and unduly burdensome on the
5 grounds that it encompasses time periods outside of those relevant for resolving jurisdictional
6 issues.

7 10. Irico objects to each and every Instruction to the extent that it purports to impose
8 burdens or obligations broader than, inconsistent with, or not authorized under the Federal Rules
9 of Civil Procedure or other applicable rule or Order of this Court.

10 **SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION**

11 **REQUEST NO. 1**

12 All versions of or amendments to any corporate charter, articles of incorporation, articles
13 of association, articles of organization, bylaws, or similar corporate governing document for
14 Group and Display.

15 **RESPONSE TO REQUEST NO. 1**

16 Irico reasserts and incorporates each of the General Objections and Objections to the
17 Definitions and Instructions set forth above. Irico further objects that this request seeks
18 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
19 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
20 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
21 disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to
22 this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status
23 as of November 26, 2007.

24 Subject to and without waiving the objections stated above, Irico responds that it will
25 produce responsive, non-privileged corporate governance documents for Group and Display
26 sufficient to show the circumstances of their creation and corporate status as of November 26,
27 2007.

REQUEST NO. 2

Documents sufficient to show Group and Display's corporate formation, ownership, purpose, structure, and organization (including any organization charts) from the time of each entity's creation to 2008.

RESPONSE TO REQUEST NO. 2

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request seeks information and documents beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007. Irico also objects that this request is duplicative and cumulative of other requests served on Irico, including Request No. 1.

Subject to and without waiving the objections stated above, Irico responds that it will produce responsive, non-privileged documents sufficient to show the circumstances of Group and Display's creation and corporate ownership, purpose, structure, and status as of November 26, 2007.

REQUEST NO. 3

All documents related to communications from Group and/or Display to any shareholder or owner of Group and/or Display from 2006 to 2008, including but not limited to any annual, quarterly, or other periodic reports and any supplemental disclosures related to any such reports.

RESPONSE TO REQUEST NO. 3

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request seeks information and documents beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and

1 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 2 request for “all documents related to communications . . .” Irico also objects that this request
 3 seeks information and documents that are publicly available. Irico also objects that this request
 4 calls for information and documents that are privileged under the attorney-client privilege and
 5 work product doctrine. Irico also objects to this request as overbroad as to the time period called
 6 for; the only relevant inquiry is Irico’s status as of November 26, 2007.

7 Subject to and without waiving the objections stated above, Irico responds that it will
 8 produce any shareholder reports for Display from 2006 to 2008.

9 **REQUEST NO. 4**

10 All documents related to Chinese government ownership and/or supervision of Group and
 11 of Display from 2006 to 2008.

12 **RESPONSE TO REQUEST NO. 4**

13 Irico reasserts and incorporates each of the General Objections and Objections to the
 14 Definitions and Instructions set forth above. Irico further objects that this request seeks
 15 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 16 and beyond that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to
 17 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 18 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 19 request for “all documents related to . . .” Irico also objects that this request seeks information
 20 and documents that are publicly available. Irico also objects that this request calls for information
 21 and documents that are privileged under the attorney-client privilege and work product doctrine.
 22 Irico also objects to this request as overbroad as to the time period called for; the only relevant
 23 inquiry is Irico’s status as of November 26, 2007. Irico also objects that this request is
 24 duplicative and cumulative of other requests served on Irico, including Requests Nos. 1 and 2.

25 Subject to and without waiving the objections stated above, Irico responds that it will
 26 produce responsive, non-privileged documents sufficient to show the extent of Chinese
 27 government ownership and supervision over Group and Display as of November 26, 2007.

1 **REQUEST NO. 5**

2 All documents related to any status, obligations, or privileges that Group or Display had
 3 under Chinese Law during the period from 2006 to 2008 because of the alleged status of Group
 4 and/or Display as an agency, instrumentality, and/or organ of China.

5 **RESPONSE TO REQUEST NO. 5**

6 Irico reasserts and incorporates each of the General Objections and Objections to the
 7 Definitions and Instructions set forth above. Irico further objects that this request seeks
 8 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 9 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
 10 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 11 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 12 request for "all documents related to . . ." Irico also objects that this request seeks information
 13 and documents that are publicly available. Irico also objects that this request calls for information
 14 and documents that are privileged under the attorney-client privilege and work product doctrine.
 15 Irico also objects to this request as overbroad as to the time period called for; the only relevant
 16 inquiry is Irico's status as of November 26, 2007. Irico also objects that this request is
 17 duplicative and cumulative of other requests served on Irico, including Requests Nos. 1, 2, and 4.

18 Subject to and without waiving the objections stated above, Irico responds that it will
 19 produce responsive, non-privileged documents sufficient to show any status, obligations, or
 20 privileges held by Group or Display under Chinese Law as of November 26, 2007.

21 **REQUEST NO. 6**

22 All documents related to communications between Group, Display, or any affiliate of
 23 Group or Display, and any individual identified in response to Interrogatory Nos. 6(a) and 7(a),
 24 included in Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories to Irico
 25 Group Corporation and Irico Display Devices Co, Ltd., dated March 5, 2018.

26 **RESPONSE TO REQUEST NO. 6**

27 Irico reasserts and incorporates each of the General Objections and Objections to the
 28 Definitions and Instructions set forth above. Irico further objects that this request seeks

1 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 2 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
 3 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 4 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 5 request for "all documents related to communications . . ." Irico also objects to this request as
 6 overbroad as to the time period called for; the only relevant inquiry is Irico's status as of
 7 November 26, 2007. Irico also objects that this request is duplicative and cumulative of other
 8 requests served on Irico, including Requests Nos. 1, 2, 4, and 5.

9 Subject to and without waiving the objections stated above, Irico responds that it will
 10 produce responsive, non-privileged documents sufficient to show the extent of Chinese
 11 government ownership and supervision over Group and Display as of November 26, 2007.

12 **REQUEST NO. 7**

13 All documents related to the statement in the Zhang Declaration that "Irico declined to
 14 answer [the DPP's complaint] because it believed that Irico Group and Irico Display were
 15 immune from suit in the United States," including but not limited to any communication with
 16 outside counsel related to such immunity from 2007 to 2010.

17 **RESPONSE TO REQUEST NO. 7**

18 Irico reasserts and incorporates each of the General Objections and Objections to the
 19 Definitions and Instructions set forth above. Irico further objects that this request seeks
 20 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 21 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
 22 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 23 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 24 request for "all documents related to . . ." Irico also objects that this request calls for
 25 information and documents that are privileged under the attorney-client privilege and work
 26 product doctrine.

REQUEST NO. 8

All documents related to pricing of CRTs during the Class Period by Group, Display, or any affiliate of Group or Display.

RESPONSE TO REQUEST NO. 8

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request seeks information and documents beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues, including as to the request for "all documents related to . . ." Irico also objects that this request calls for information and documents that are privileged under the attorney-client privilege and work product doctrine. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

REQUEST NO. 9

All documents related to the sale or pricing of CRTs in the United States (including but not limited to any actual, planned, or contemplated sales of CRTs in the United States by Group, Display, or any affiliate of Group or Display, either directly or indirectly) during the Class Period.

RESPONSE TO REQUEST NO. 9

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request seeks information and documents beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues, including as to the request for "all documents related to . . ." Irico also objects that this request calls for information and documents that are privileged under the attorney-client privilege and work

1 product doctrine. Irico also objects to this request as overbroad as to the time period called for;
 2 the only relevant inquiry is Irico's status as of November 26, 2007.

3 Subject to and without waiving the objections stated above, Irico will produce responsive,
 4 non-privileged documents, if any, sufficient to identify any sales of CRTs in the United States by
 5 Group or Display during the Class Period.

6 **REQUEST NO. 10**

7 All documents related to any Meeting identified in Exhibit 11 to the Declaration of
 8 R. Alexander Saveri dated January 11, 2018 (including but not limited to any communications by,
 9 between, or among any directors, officers, or Employees of Group or Display related to such
 10 Meetings).

11 **RESPONSE TO REQUEST NO. 10**

12 Irico reasserts and incorporates each of the General Objections and Objections to the
 13 Definitions and Instructions set forth above. Irico further objects that this request seeks
 14 information and documents beyond the scope of what is relevant to resolving jurisdictional issues
 15 and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to
 16 Compel. Irico also objects that this request is overbroad, unduly burdensome, and
 17 disproportionate to the needs of the case in resolving jurisdictional issues, including as to the
 18 request for "all documents related to . . ." Irico also objects that this request calls for
 19 information and documents that are privileged under the attorney-client privilege and work
 20 product doctrine. Irico also objects to this request as overbroad as to the time period called for;
 21 the only relevant inquiry is Irico's status as of November 26, 2007.

22 **REQUEST NO. 11**

23 All documents that Wenkai Zhang reviewed or relied on in preparing his declaration.

24 **RESPONSE TO REQUEST NO. 11**

25 Irico reasserts and incorporates each of the General Objections and Objections to the
 26 Definitions and Instructions set forth above.

27 Subject to and without waiving the objections stated above, Irico responds that all such
 28 responsive, non-privileged documents will be produced in response to Plaintiff's other requests.

1 **REQUEST NO. 12**

2 All documents identified or described in response to any of the interrogatories included in
3 Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories to Irico Group
4 Corporation and Irico Display Devices Co, Ltd., dated March 5, 2018.

5 **RESPONSE TO REQUEST NO. 12**

6 Irico reasserts and incorporates each of the General Objections and Objections to the
7 Definitions and Instructions set forth above.

8 Subject to and without waiving the objections stated above, Irico responds that it will
9 produce non-privileged documents responsive to this request.

10 Dated: May 4, 2018

BAKER BOTTs LLP

12 */s/ Stuart C. Plunkett*

13 Stuart C. Plunkett
14 Email: stuart.plunkett@bakerbotts.com
15 BAKER BOTTs L.L.P.
16 101 California Street, Suite 3600
17 San Francisco, CA94111
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25 1299 Pennsylvania Ave., NW
26 Washington, D.C. 20004
27 Telephone: (202)-639-7700
28 Facsimile: (202)-639-7890

29 *Attorneys for Defendants*
30 ***IRICO GROUP CORP. and***
31 ***IRICO DISPLAY DEVICES CO., LTD.***

CERTIFICATE OF SERVICE

In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917

I declare that I am employed in the County of San Francisco, California. I am over the age of eighteen years and not a party to the within case; my business address is: Baker Botts LLP, 101 California Street, Suite 3600, San Francisco, CA 94111.

On May 4, 2018, I served the following document(s) described as:

**IRICO DEFENDANTS' RESPONSES TO DIRECT PURCHASER PLAINTIFF STUDIO
SPECTRUM, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO IRICO GROUP CORPORATION AND
IRICO DISPLAY DEVICES CO., LTD.**

on the following interested parties in this action:

Guido Saveri (guido@saveri.com)
R. Alexander Saveri (rick@saveri.com)
Geoffrey C. Rushing (grushing@saveri.com)
Cadio Zirpoli (cadio@saveri.com)
Matthew D. Heaphy (mheaphy@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200,
San Francisco, CA 94111

Mario N. Alioto (malioto@tatp.com)
Lauren C. Capurro (laurenrussell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)
TRUMP, ALIOTO, TRUMP & PRESCOTT,
LLP
2280 Union Street
San Francisco, CA 94123

Lead Counsel for the Direct Purchaser Plaintiffs

Lead Counsel for the Indirect Purchaser Plaintiffs

[] (BY OVERNIGHT DELIVERY) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I placed the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

[] (BY MAIL) by placing a true copy thereof in a sealed envelope with postage fully prepaid and addressed to the persons at the addresses as shown above. I am readily familiar with the business practice of Baker Botts LLP for collection and processing of correspondence for mailing with the United States Postal Service, and the correspondence would be deposited with United States Postal Service that same day in the ordinary course of business.

(BY ELECTRONIC MAIL) I caused such documents to be sent to the persons at the email addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 4, 2018, 2012 at San Francisco, California.

/s/ *Stephanie DM Pearson*

Stephanie DM Pearson

EXHIBIT 5

IRI -CRT001

I RI -CRT001

bI RI -CRT-00000624b¶bI RI -CRT-00000627b¶bI RI C0b¶bI ri co Corporate Archi vesb¶bb
 bI RI -CRT-00000628b¶bI RI -CRT-00000629b¶bI RI C0b¶bI ri co Corporate Archi vesb¶bb
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bI RI -CRT-00000811b¶bI RI -CRT-00000811b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000811_CONFIDENTIAL. xl sxb

bI RI -CRT-00000812b¶bI RI -CRT-00000812b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000812_CONFIDENTIAL. xl sxb

bI RI -CRT-00000813b¶bI RI -CRT-00000813b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000813_CONFIDENTIAL. xl sxb

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Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000814_CONFIDENTIAL. xl sxb

bI RI -CRT-00000815b¶bI RI -CRT-00000815b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000815_CONFIDENTIAL. xl sxb

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Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000818_CONFIDENTIAL. xl sxb

bI RI -CRT-00000819b¶bI RI -CRT-00000819b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000819_CONFIDENTIAL. xl sxb

bI RI -CRT-00000820b¶bI RI -CRT-00000820b¶bI RI C0b¶bI ri co Corporate

Archi vesb¶bI RI -CRT001\NATI VES\001\I RI -CRT-00000820_CONFIDENTIAL. xl sxb

bI RI -CRT-00000821b¶bI RI -CRT-00000821b¶bI RI C0b¶bI ri co Corporate

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EXHIBIT 6

SAVERI & SAVERI, INC.
706 SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 217-6810
TELECOPIER: (415) 217-6813

May 17, 2018

VIA EMAIL

John Taladay
Baker Botts LLP
The Warner
1299 Pennsylvania Ave., NW
Washington, D.C. 20004-2400
john.taladay@bakerbotts.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917,*
Master File No. 07-CV-5944-JST

Dear John:

I write regarding the recent discovery responses of your clients, Defendants Irico Display Devices Co., Ltd. and Irico Group Corporation (the “Irico Defendants”). Plaintiffs would like to meet and confer at your earliest convenience regarding the Irico Defendants’ Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of Interrogatories (May 4, 2018) (“Interrogatory Responses”) and the Irico Defendants’ Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of Requests for Production of Documents (May 4, 2018) (“RFP Responses”), as detailed below.

In general, your clients fail to respond fully to the discovery, relying instead on objections that Plaintiffs seek “information and documents beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel”; or that the interrogatories and RFPs are “overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues.” In other instances, your clients simply fail to provide full answers.

The discovery served on March 5, 2018 is narrowly tailored to jurisdictional issues. Plaintiffs proposed such discovery in their Opposition to the Irico Defendants’ Motion to Set Aside Default, ECF No. 5228 at 17–18 (“[I]limited discovery would be appropriate on the following topics: . . .”), and the Court, noting Plaintiffs’ request, did not suggest that it was overbroad, unduly burdensome, or disproportionate to the needs of the case. *See In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917, Case No. C-07-5944 JST, 2018 WL 659084, at *11 (N.D. Cal. Feb. 1, 2018).

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Moreover, as the Court has emphasized, your clients must support any objections of “undue burden” with detailed explanations of the effort and expense production of the requested information would require.

General Objections

It is unclear to Plaintiffs whether your clients are withholding any documents or information based on their General Objections. To the extent they are, Plaintiffs request an explanation of what is being withheld based on each particular objection.

Several “General Objections” merit comment now. First, the Irico Defendants object to Definition No. 6 of Plaintiffs’ Interrogatories and Definition 16 of the RFPs (“You” and “Your”) on several bases, including that it is “legally incorrect.” Plaintiffs wish to meet and confer regarding this issue and request that you make clear precisely how you are interpreting these terms.

Second, General Objection No. 14 to the Interrogatory Responses and the RFP Responses lacks merit. The Irico Defendants object to the interrogatories and RFPs, on the grounds of undue burden and relevance, “to the extent that they seek information or documents concerning transactions outside the United States . . . because they do not relate to actions by Irico in or causing a direct effect in the United States.” Pricing decisions and transactions outside the United States can directly affect prices in the United States, and therefore are relevant. Furthermore, the Irico Defendants have not explained or quantified the burden of searching for or producing such information or documents.

Third, General Objection No. 17 to the Interrogatory Responses and the RFP Responses “that compliance would require Irico to seek information or documents stored on backup or archived databases or other systems that are not readily accessible or otherwise no longer active” lacks merit in light of the Irico Defendants’ withdrawal from the litigation for over seven years. In addition, it is not clear what information is being withheld based on this objection. Plaintiffs request that the Irico Defendants identify the responsive information or documents stored on backup or archived databases or other systems that are not readily accessible or otherwise no longer active.

Fourth, General Objection No. 5 to the Interrogatory Responses and the RFP Responses that “the definition of the ‘Relevant Time Period’ (Definition No. 12) [is] overbroad, unduly burdensome, beyond the applicable statute of limitations, and beyond the relevant time period for determining jurisdictional issues” also lacks merit. In fact, Plaintiffs narrowly tailored most of their interrogatories and RFPs to the time period around which the first complaint was filed. Plaintiffs require, and it is reasonable to request, information and documents from a two to three year period in order to assess the jurisdictional status of Group and Display. Plaintiffs disagree that “the only relevant inquiry is Irico’s status as of November 26, 2007.”

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Overarching Issues Regarding Interrogatory Responses

Each of the interrogatories requested the identity of natural persons, including Chinese officials, Irico Employees, officers or agents, and all Persons with knowledge of the matter of the inquiry. Instructions Nos. 1 and 2 of Plaintiffs' interrogatories specify the information to be provided about persons. Since the Irico Defendants only identified natural persons with knowledge, they should have indicated "the person's name, employer, position dates of employment/tenure, and home address for all times during the Relevant Time Period." The Irico Defendants objected on several grounds and only provided the person's name. Plaintiffs wish to meet and confer regarding the bases for the objections as well as the availability of the information requested by the interrogatories as set forth in Instruction No. 1. In each case, as well, it appears the Irico Defendants have not identified "all" or even close to all individuals with knowledge.

Each of the interrogatories also requested "[t]he identity of all Documents which support the contention," or some variation thereof. In all of the Interrogatory Responses identifying documents, the Irico Defendants uniformly refer "Plaintiff to documents Bates labeled IRI-CRT-00000001 to IRI-CRT-00000904"—the entirety of the Irico Defendants' first document production consisting of 156 unique records, virtually all of which are in Chinese. This is patently inadequate. Plaintiffs request that the Irico Defendants immediately supplement their responses to specifically identify the documents to which their responses refer. It is also unclear whether your clients have identified all responsive documents.

Issues Regarding Specific Interrogatory Responses

Interrogatory Responses Nos. 1 and 2 are incomplete and consist almost entirely of conclusory and vague generalized assertions. For example, Interrogatory Response No. 2 states that "Display's stated purpose was to make greater contributions to China's national economic development by satisfying the domestic need for CRT products." This response is inadequate. Plaintiffs request that the Irico Defendants supplement their response to provide specific information regarding the basis for the above-quoted assertion and where such purpose was stated.

Interrogatory Responses Nos. 3 and 4 are also incomplete and consist almost entirely of conclusory and vague generalized assertions. The responses only provide information as of November 26, 2007; inadequately identify one or two persons with knowledge; and refer to the entire document production. Specifically, Interrogatory Response No. 3 is a conclusory statement, not a description. While Interrogatory Response No. 4 contains more detail, the statement regarding the classification of Display by SASAC is opaque and lacks detail.

Interrogatory Response No. 5 is similarly deficient. The response only provides information as of November 26, 2007; inadequately identifies only two persons with knowledge; and refers to the entire document production. It states that "[a]s a state-owned

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holding company, Irico Display also enjoyed many benefits . . . that did not apply to non-state owned corporations,” and that “Display also benefitted from special guidance and coordination from SASAC in overcoming business difficulties and solving problems.” This response is inadequate. Plaintiffs request that the Irico Defendants supplement their response to provide more information regarding the bases for the above-quoted assertions.

Interrogatory Responses Nos. 6 and 7 are conclusory and not responsive to Plaintiffs’ interrogatories. Both incorporate other responses and state the entities were “subject to supervision” by certain entities but do not describe the supervision, as requested. Plaintiffs request that the Irico Defendants supplement their responses to include the requested information.

Interrogatory Response No. 8 is incomplete, vague and conclusory. The response only provides information as of November 26, 2007; inadequately identifies only two persons with knowledge; and refers to the entire document production. It is also unclear from the response whether the actions described in the response were provided for under Chinese Law or in fact were taken.

Interrogatory Response No. 9 contains only objections. The response does not state whether the Irico Defendants refuse to answer or are withholding documents on the basis of the objections. Plaintiffs request that the Irico Defendants supplement their response to this interrogatory. Mr. Zhang’s investigation is plainly relevant to the issues before the Court.

Interrogatory Response No. 10 refers Plaintiffs to Nos. 5 and 6. This response is incomplete. The interrogatory requested an explanation of the Irico Defendants’ “contention that Group was managed directly by the Chinese government (or a political subdivision thereof) *through the filing* of the original complaint” (emphasis added). Interrogatory Response No. 5 provides information only for a single day as to Group: “On November 26, 2007, Irico Group was a state-owned enterprise wholly owned and funded by the State Council of the People’s Republic of China.” The remainder of Interrogatory Response No. 5 contains unsupported conclusory assertions and is otherwise inadequate, as indicated above.

Interrogatory Response No. 11 also refers Plaintiffs to Nos. 5 and 6 and is also inadequate. In particular, Interrogatory Response No. 5 describes certain actions SASAC was authorized to take under the Interim Regulations. However, nowhere in the responses do the Irico Defendants state that Group’s management was in fact appointed by SASAC after 2003 or provide any actual evidence. Plaintiffs request that the Irico Defendants supplement their response to include such information.

Interrogatory Response No. 12 refers Plaintiffs to Nos. 4 through 7. This interrogatory requests information regarding the contention that Display was a State-owned holding company at the time of the filing of Plaintiffs’ original complaint on

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November 26, 2007. Unlike other responses, which provide information only with respect to that date, Interrogatory Response No. 5 refers generally to the entire year—“Irico Display was registered as and held the status of a ‘state-owned holding company’ in 2007”—and therefore fails to respond to the interrogatory.

Interrogatory Response No. 13 refers Plaintiffs to Nos. 4 through 8. This response is also inadequate. In particular, Interrogatory Response No. 5 describes certain actions SASAC was authorized to take under the Interim Regulations, including to “appoint representatives to Display shareholder meetings to exercise authority as the controlling shareholder under SASAC’s instructions.” However, nowhere in the responses do the Irico Defendants state that Display’s management was in fact reviewed by any of Display’s shareholders, including the controlling shareholder, Group. Plaintiffs request that the Irico Defendants supplement their response to include such information.

Interrogatory Response No. 14 states that “[a] Notice issued by the Supreme People’s Court and Supreme People’s Procuratorate of China (the highest Chinese court and prosecuting authority, respectively) clarified that the top management in state-owned holding companies such as Display are considered state functionaries under this law.” The response also cites examples from the period of 2013 to 2015 where “three managers of a subsidiary of Display were tried as public officials and convicted for accepting bribes during the course of their duties.” Plaintiffs request that the Irico Defendants supplement their response to provide more information regarding the bases for the above-quoted assertions and the relevance of the example, given the Irico Defendants assertion, in their RFP Responses, that “the only relevant inquiry is Irico’s status as of November 26, 2007.”

Interrogatories Nos. 15 and 17 requested information about the indirect management of Display by the Ministry of Industry and Information Technology of the State Council. The Irico Defendants responses to these interrogatories refer to other responses which make no mention of the Ministry of Industry and Information Technology of the State Council. Plaintiffs request that the Irico Defendants supplement their responses to provide responsive information regarding the role, if any, of the Ministry of Industry and Information Technology of the State Council in the management of Display.

Interrogatories Nos. 16 and 18 are also deficient. They refer to other interrogatory responses that contain conclusory assertions and other statements that do not directly support the contentions about which the interrogatories inquire.

Interrogatory Response No. 19 refers Plaintiffs to Nos. 5 through 7 and is deficient for reasons noted above. Interrogatory No. 19, part c, requested “[a]ll instances in which [Irico Group’s] approval was sought from, granted or denied in whole or in part by the ‘relevant agency of the State Council’” in order for Display to take action in connection with “some matters beyond Irico Group’s authority.” The Irico Defendants response to this interrogatory refers to other responses which detail no such instances.

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Plaintiffs request that the Irico Defendants supplement their response to provide details of such instances.

Interrogatory No. 20 requested a description of “Irico’s sales and marketing of CRT Products in the United States during the Class Period, and/or attempts to sell or market any CRT Products in the United States during the Class Period.” The Irico Defendants’ response states that “Irico will produce or make available for inspection business records from which the answer to this Interrogatory may be determined.” Plaintiffs inquire whether such business records are included in the Irico Defendants’ first document production (IRI-CRT-00000001 to IRI-CRT-00000904). Plaintiffs also wish to confirm that the business records include, or will include, information or data regarding “attempts to sell or market any CRT Products in the United States during the Class Period” in light of RFP Response No. 9 (“Irico will produce responsive, non-privileged documents, if any, sufficient to identify *any sales of CRTs* in the United States by Group or Display during the Class Period” (emphasis added)).

Interrogatory Response No. 21 contains only objections. The response does not state whether the Irico Defendants refuse to answer or are withholding documents on the basis of the objections. Plaintiffs request that the Irico Defendants supplement their response to this interrogatory.

Overarching Issues Regarding RFP Responses

First, most—but not all—of Plaintiffs’ RFPs requested production of “[a]ll documents,” whereas in their responses the Irico Defendants stated that they would “produce responsive, non-privileged documents sufficient to show” See RFP Responses Nos. 1, 4, 5, 6, 9. Plaintiffs request that the Irico Defendants provide information regarding the availability of responsive documents and quantify the burden that production of such documents would impose.

Second, many of Plaintiffs’ RFPs requested documents covering a longer time period than the Irico Defendants are willing to produce. The Irico Defendants’ position that “the only relevant inquiry is Irico’s status as of November 26, 2007” is unreasonable. Plaintiffs seek clarification of the Irico Defendants’ below RFP Responses and the “overbroad as to the time period” objections:

RFP No.	RFP Time Period	“Will Produce” Time Period
1	Unspecified; Relevant Time Period defined as “January 1, 1995 through the present”	“as of November 26, 2007”
2	“from the time of each entity’s creation to 2008”	“as of November 26, 2007”
4	“from 2006 to 2008”	“as of November 26, 2007”
5	“from 2006 to 2008”	“as of November 26, 2007”

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6	Unspecified; Relevant Time Period defined as “January 1, 1995 through the present”	“as of November 26, 2007”
7	“from 2007 to 2010”	n/a
8	“during the Class Period”	n/a (objection: “the only relevant inquiry is Irico’s status as of November 26, 2007”)
10	Unspecified; Relevant Time Period defined as “January 1, 1995 through the present”	n/a (objection: “the only relevant inquiry is Irico’s status as of November 26, 2007”)

Plaintiffs further request that the Irico Defendants supplement their responses and produce documents for the time periods set forth in the RFPs.

Issues Regarding Specific RFP Responses

RFP No. 2 requested “[d]ocuments sufficient to show Group and Display’s corporate formation, ownership, purpose, structure, and organization (including any organization charts) from the time of each entity’s creation to 2008.” Plaintiffs inquire whether the Irico Defendants have organizational charts and, if so, whether they will be produced. If any such documents are being withheld, please state the basis.

RFP No. 3 requested “[a]ll documents related to communications from Group and/or Display to any shareholder or owner of Group and/or Display from 2006 to 2008, including but not limited to any annual, quarterly, or other periodic reports and any supplemental disclosures related to any such reports.” RFP Response No. 3 states that “will produce any shareholder reports for Display from 2006 to 2008.” Plaintiffs inquire whether the Irico Defendants has other responsive documents besides shareholder reports and, if so, whether they will be produced. If any such documents are being withheld, please state the basis.

RFP No. 6 requested “[a]ll documents related to communications between Group, Display, or any affiliate of Group or Display,” and certain individuals. The response states that the Irico Defendants will produce documents showing “the extent of Chinese government ownership and supervision over Group and Display as of November 26, 2007.” This response appears to be nonresponsive and inadequate.

In RFP Response No. 7, the Irico Defendants invoke the attorney-client privilege and work product doctrine. Plaintiffs inquire whether the Irico Defendants are withholding any documents of the basis of any other objections and, if so, on what bases.

Plaintiffs further inquire whether the Irico Defendants are withholding any documents responsive to RFPs Nos. 8, 10 and 11 and, if so, on what bases.

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RFP No. 9 requested “All documents related to the sale or pricing of CRTs in the United States (including but not limited to any actual, planned, or contemplated sales of CRTs in the United States by Group, Display, or any affiliate of Group or Display, either directly or indirectly) during the Class Period.” RFP Response No. 9 states only that “Irico will produce responsive, non-privileged documents, if any, sufficient to identify any sales of CRTs in the United States by Group or Display during the Class Period.” Plaintiffs inquire whether the Irico Defendants will produce documents related to any planned or contemplated sales of CRTs in the United States.

Please let us know your availability for a call to discuss these matters. Thank you.

Very truly yours,

s/ Matthew D. Heaphy

Matthew D. Heaphy

Cc: Erik T. Koons
Thomas E. Carter
Ashley Eickhof
Stuart C. Plunkett
Kaylee Yang

crt.689

EXHIBIT 7

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May 28, 2018

VIA E-MAIL

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Re: *In re: Cathode Ray Tube (CRT) Antitrust Litigation -*
Master File No. 3:07-cv05944-JST; MDL No. 1917

Dear Matthew:

I write in response to your May 17, 2018 letter regarding Defendants' Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories ("Interrogatory Responses") and Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Requests for Production of Documents ("RFP Responses").

As an initial matter, your letter fails to provide any analysis or authority in support of Plaintiffs' requests or the alleged deficiencies in Defendants' responses. We nonetheless endeavor to provide our comments in advance of our telephonic meet and confer.

General Objections

Defendants are not withholding documents based on any General Objection. Regarding Defendants' objection that Plaintiffs' Interrogatories and RFPs definitions of "You" and "Your" (Nos. 6 and 16, respectively) are "legally incorrect," Defendants will not accept a definition of "You" and "Your" that expands the scope of Defendants' discovery obligations beyond those imposed by the Federal Rules of Civil Procedure. Where relevant, Defendants will interpret "You" and "Your" to refer to Defendants.

Regarding General Objection No. 14 to the Interrogatory Responses and the RFP Responses, Defendants disagree that any information or documents regarding transactions outside the United States are relevant to jurisdiction. We are willing to meet and confer so you can provide the basis for this request.

Regarding General Objection No. 17 to the Interrogatory Responses and the RFP Responses “that compliance would require Irico to seek information or documents stored on backup or archived databases or other systems that are not readily accessible or otherwise no longer active,” Defendants are not currently withholding responsive documents on this basis.

Regarding General Objection No. 5 to the Interrogatory Responses and the RFP Responses that “the definition of the ‘Relevant Time Period’ (Definition No. 12) [is] overbroad, unduly burdensome, beyond the applicable statute of limitations, and beyond the relevant time period for determining jurisdictional issues,” Defendants disagree that Plaintiffs are entitled to information and documents “from a two or three year period” before the date the complaint was filed, November 26, 2007. However, we suggest addressing timing issues with regard to specific requests.

Overarching Issues Regarding Interrogatory Responses

Regarding Instructions Nos. 1 and 2 of Plaintiffs’ interrogatories which request “the person’s name, employer, position dates of employment/tenure, and home address for all times during the Relevant Time Period” of “all persons” with potentially relevant knowledge, Defendants’ position is that this request is overly broad. Plaintiffs can contact any of the persons listed through counsel.

Regarding Defendants’ reference to documents bearing Bates labels IRI-CRT-00000001 to IRI-CRT-00000904, all documents are relevant to jurisdiction under the FSIA. However, Defendants are willing to meet and confer regarding a reasonable solution to this issue.

Issues Regarding Specific Interrogatory Responses

Regarding Interrogatory Responses Nos. 1 and 2, Defendants disagree that these responses are insufficient. Defendants are not required to write a detailed narrative in response to overly broad interrogatories. In any event, Plaintiffs now possess the documents that support these interrogatory responses.

Regarding Interrogatory Response No. 5, Defendants maintain that only information as of the complaint’s filing date—November 26, 2007—is relevant. Plaintiffs provide no authority or analysis to support their contrary position. Further, to the extent Plaintiffs seek greater or more specific details, they now have the documents that support the narrative response.

Regarding Interrogatory Responses Nos. 6 and 7, Defendants’ disagree that these responses are insufficient, as they provide information regarding the Chinese government’s supervision. If Plaintiffs seek greater or more specific details, they now have the supporting documents.

Regarding Interrogatory Response No. 8, Defendants maintain that only information as of the complaint's filing date—November 26, 2007—is relevant. Plaintiffs provide no authority or analysis to support their contrary position. It is not clear from your letter what additional information Plaintiffs seek.

Regarding Interrogatory Response No. 9, Defendants stand on their objections. Mr. Zhang's investigation supported a motion that has now been decided.

Regarding Interrogatory Response No. 10, Defendants maintain that only information as of the complaint's filing date—November 26, 2007—is relevant. Thus, Plaintiffs' request for an “explanation” of Group's management prior to that date is irrelevant.

Regarding Interrogatory Response No. 11, Defendants maintain that only information as of the complaint's filing date—November 26, 2007—is relevant. Thus, Plaintiffs' request for evidence or information related to Group's appointed management in 2003 is irrelevant.

Regarding Interrogatory Response No. 12, Defendants' responses to the referenced interrogatory are sufficient. It is not clear what further supplementation is needed.

Regarding Interrogatory Response No. 13, Defendants' description of SASAC's authority appears sufficient to respond to the request. However, Defendants are willing to meet and confer to discuss further supplementation.

Regarding Interrogatory Response No. 14, Defendants' disagree that this response is insufficient. Plaintiffs now possess documents containing greater details on these matters.

Regarding Interrogatories Nos. 15 and 17, Defendants' disagree that these responses are insufficient. Plaintiffs now possess documents containing greater details on these matters.

Regarding Interrogatories Nos. 16 and 18, Defendants' disagree that these responses are insufficient. We are willing to meet and confer regarding any needed supplementation.

Regarding Interrogatory Response No. 19, Defendants reiterate that a request for “all instances” is overbroad, and Plaintiffs do not explain how Defendants can respond in a reasonable manner. Defendants are willing to meet and confer regarding a reasonable solution to this issue.

Regarding Interrogatory No. 20, Defendants confirm that it will provide information, if any, regarding attempts to sell or market any CRT Products in the United States during the Class Period.

Regarding Interrogatory Response No. 21, Defendants stand on their objections.

Overarching Issues Regarding RFP Responses

First, Defendants' limitation of its agreement to produce documents to those "sufficient to show" is appropriate. Defendants need not quantify the burden to justify its limited response to overbroad requests for irrelevant documents.

Second, the jurisdictional inquiry under the FSIA focuses on the date of the complaint—November 26, 2007. As stated previously, Defendants are willing to meet and confer regarding the timing of specific requests.

Issues Regarding Specific RFP Responses

Regarding RFP No. 2, Plaintiffs have not stated what relevance organizational charts may have or what information they are attempting to discern from such charts. Defendants are willing to meet and confer on this point.

Regarding RFP No. 3, Defendants are unaware of any regular shareholder communications, outside of those produced. However, if there is a specific communication Plaintiffs request, please specify.

Regarding RFP No. 6, Defendants stand on their objection that Plaintiffs' request for "*all documents related* to communications between Group, Display, or *any* affiliate of Group or Display and *any* individual identified" is overly broad. Defendants are willing to meet and confer on a reasonable solution.

Regarding RFPs Nos. 8, 10 and 11, wherever Defendants have not agreed to produce documents, they are standing on their objections.

Regarding RFP No. 9, Defendants will produce documents sufficient to show any planned or contemplated sales of CRTs in the United States during the relevant period, to the extent they exist.

I look forward to our discussion of these matters.

Sincerely,



Stuart C. Plunkett

cc: Mario N. Alioto (malioto@atap.com)
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Joseph M. Patane (jpatane@atap.com)

EXHIBIT 8

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June 4, 2018

VIA E-MAIL

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Re: *In re: Cathode Ray Tube (CRT) Antitrust Litigation -*
Master File No. 3:07-cv05944-JST; MDL No. 1917

Dear Counsel:

During our meet and confer discussions last week regarding Irico's responses to DPP's discover requests, we agreed to identify the specific documents that support Irico's interrogatory responses. We provide this information below. Irico will formally supplement its responses at a later date, but we wanted to get this information to you as soon as possible.

Interrogatory No. 1 (Circumstances of Irico Group's Creation)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000517-520, -527, -530-532, -649, -650-652, -773-778, and -779-785.

Interrogatory No. 2 (Circumstances of Irico Display's Creation)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000487, -488, -666-669, and -853-854.

Interrogatory No. 3 (Ownership of Irico Group)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000512-516, -662-665, and -680-682.

Interrogatory No. 4 (Ownership of Irico Display)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000232-321, -489-502, -571-572, -662-665, and -670-671.

Interrogatory No. 5 (Status, Obligations, and Privileges of Group and Display)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000001-013, -020, -021, -022, -023, -024, -025, -026, -027, -028, -029, -503-507, -521-523, -524-526, -528-529, -571-572, -581-582, -583, -584-585, -586-587, -588, -589-592, -593, -594-596, -602-605, -606-609, -610-611, -613-617, -618-623, -624-627, -628-629, -630-631, -632-633, -634-643, -644-648, -672-679, -709-711, -712-717, -718-720, -730-736, -737, -738, -739, -740, -742-743, -752-754, -786-789, -790-793, -794-796, -797-799, -805-809, -853-854, -855, -860, -861-862, and -865-875.

Interrogatory No. 6 (Government Supervision of Irico Group)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000020, -021, -022, -023, -024, -025, -026, -027, -028, -029, -521-523, -524-526, -528-529, -581-582, -583, -586-587, -588, -589-592, -593, -594-596, -602-605, -606-609, -610-611, -613-617, -618-623, -624-627, -628-629, -630-631, -632-633, -634-643, -644-648, -709-711, -712-717, -718-720, -730-736, -737, -738, -739, -740, -742-743, -752-754, -786-789, -790-793, -794-796, -797-799, -805-809, and -865-875.

Interrogatory No. 7 (Government Supervision of Irico Display)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000001-013, -503-507, -571-572, -584-585, -672-679, -853-854, -855, -860, and -861-862.

Interrogatory No. 8 (Role of Irico Group Electronics)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000653-661 and -672-679.

Interrogatory No. 14 (Irico Display Management's Status as State Officials)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000014-019, -533, -534-536, -537-539, -540-555, -556-570, -721-729, -755-763, and -764-772.

BAKER BOTTS LLP

June 4, 2018

Interrogatory No. 20 (Sales, Marketing, and Attempts to Sell CRTs in the United States)

Irico refers Plaintiffs to documents Bates labeled IRI-CRT-00000833 through -841, and notes that it intends to produce or make available for inspection Irico hard copy accounting records showing all CRT sales during the Class Period.

Sincerely,



Stuart C. Plunkett

cc: Mario N. Alioto (malioto@atap.com)
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EXHIBIT 9

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June 5, 2018

VIA EMAIL

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Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917,*
Master File No. 07-CV-5944-JST

Dear Stuart:

I write regarding our meet and confer calls on May 29, May 30, and June 1, 2018 about the Irico Defendants' Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories (May 4, 2018) ("Interrogatory Responses") and the Irico Defendants' Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Requests for Production of Documents (May 4, 2018) ("RFP Responses"). This letter memorializes the status of the issues addressed in Plaintiffs' May 17 letter, your May 28 letter, and during our meet and confer.

Document Production Issue

Plaintiffs inquired whether your clients have OCR text files for the documents produced on May 4, 2018 (IRI-CRT-00000001 to IRI-CRT-00000904) that are searchable in Chinese. You indicated that there may have been a "hiccup" with respect to the production of such files. You also stated that some files may not be of adequate resolution to produce OCR files. Plaintiffs requested that the Irico Defendants produce the text files as soon as possible. You provided them on May 30, 2018. As you indicated would likely be the case, some files remain unsearchable.

Status of Witness Inquiry

Plaintiffs asked when they could expect a response to their April 9, 2018 letter regarding the status of current or former employees, pursuant to paragraph IV.C of the Court's Order re Discovery and Case Management Protocol (ECF No. 1128). You stated that you had received information from your clients on May 28, 2018, and that you hoped to respond to Plaintiffs' April 9 letter soon by Friday, June 1. Plaintiffs requested that you send this as soon as possible. You have not responded as yet.

Stuart C. Plunkett

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You also stated that you may need to ask Plaintiffs about certain names that your clients were unable to identify. You suggested that we schedule a call to discuss this matter once you have responded to Plaintiffs' April 9 letter.

General Objections

Plaintiffs inquired about General Objection No. 17 to the Interrogatory Responses and the RFP Responses, specifically about the existence of "information or documents stored on backup or archived databases or other systems that are not readily accessible or otherwise no longer active." You stated that none of Plaintiffs' requests called for such information or documents. You recognized that Plaintiffs are entitled to know about the existence of such information or documents and that you "are working on it." You stated, for example, that "there are vast quantities of accounting records that show sales" in document archives—two rooms in a building in China, retained pursuant to Chinese law—but that you were not in a position to list all such information or documents without going over it with your clients and vendor. You also stated that they contain all CRT sales data for the Relevant Period, and that there are no complete summary records. It is unclear to Plaintiffs whether any such information exists in summary or electronic form. In addition, you did not know what information your clients' former counsel used to prepare the export data produced to Plaintiffs in January 2009. Plaintiffs request that you investigate what summaries and backup exist, whether in electronic or paper form.

You further stated that it is your clients' position that the responses are adequate given that they respond to jurisdictional discovery and that your clients claim foreign sovereign immunity. You stated in your May 28 letter that the Irico "Defendants are not currently withholding responsive documents on this basis."

Limitations on Time Period

Plaintiffs reserve their rights with respect to the time period covered by the Interrogatory Responses and RFP Responses. As discussed during the meet and confer, the information and documents provided in response to the interrogatories do not necessarily correspond to the specified time period but you believe are sufficient to show the status of the Irico Defendants on November 26, 2007, the date the complaint was filed. Plaintiffs will review the documents to determine whether the time period is adequate now that the Irico Defendants have provided the specific document citations, as Plaintiffs requested. As discussed, however, Plaintiffs are concerned that without a clearly defined time period, relevant documents and/or information may be withheld.

Responses to Interrogatories

Plaintiffs explained that the interrogatories sought the basis for your clients' various positions regarding their FSIA defense, but that your clients' responses simply repeated their generalized assertions and failed to supply meaningful detail. You stated that the Irico Defendants will not agree to supplement their responses to any

Stuart C. Plunkett

6/5/2018

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interrogatories. Plaintiffs and the Irico Defendants thus are at issue with respect to all of the interrogatories for which Plaintiffs requested supplemental responses in their May 17, 2018 letter, except as indicated below.

However, you agreed to provide specific document citations for each interrogatory response—instead of referring to the entire document production—and you did so on June 4, 2018. You suggested that specific references to documents in the Irico Defendants’ production would provide additional details and therefore satisfy Plaintiffs’ concerns regarding the inadequacy of certain interrogatory responses.

Plaintiffs also requested that the Irico Defendants provide additional persons with knowledge regarding each interrogatory response. Plaintiffs’ position is that the Irico Defendants should provide the names of all persons with knowledge. It is inadequate to select one or two individuals. The Irico Defendants’ position is that their responses are adequate. The parties, therefore, are at issue.

You also stated that you did not know whether any of the persons identified have personal knowledge of the information for which they were identified. Plaintiffs reserve their rights as to this issue.

Furthermore, the Irico Defendants will provide information about the persons listed in the interrogatory responses in your response to Plaintiffs April 9, 2018 letter (see above) and, to the extent such persons are not included in the response, you agreed to provide the requested information about them separately. You also agreed to consider supplementing the Irico Defendants’ responses to incorporate this information. Plaintiffs indicated that they would ask the Irico Defendants do so.

Regarding Interrogatory No. 21, you represented that the foreign compulsion contention about which Plaintiffs inquired would not be at issue in the Irico Defendants’ motion. Plaintiffs therefore stated that they would not pursue a supplemental response. Plaintiffs reserve their right to do so in the event the Irico Defendants decide to raise foreign compulsion as a defense.

Lastly, you stated during our first call that you would not argue that Plaintiffs have waived their rights to challenge any interrogatories not raised at this time.

Responses to RFPs

Regarding RFP No. 1, Plaintiffs asked whether the Irico Defendants had produced all documents requested, given the Irico Defendants’ response that they “will produce responsive, non-privileged corporate governance documents for Group and Display sufficient to show the circumstances of their creation and corporate status as of November 26, 2007.” Plaintiffs also asked whether the documents produced covered by creation and corporate status as of November 26, 2007. You agreed to inquire. Plaintiffs explained their concern, in light of the Court’s remarks in the context of the Motion to

Stuart C. Plunkett

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Set Aside Default that, to the extent possible, the Irico Defendants produce the articles of incorporation that were in effect on or around November 26, 2007. You agreed to provide more information and ensure that the Irico Defendants produced all such documents in their possession.

In the context of RFP No. 2, Plaintiffs inquired whether the Irico Defendants would produce all documents that they intend to rely on in support of their forthcoming motion. You stated that the Irico Defendants would not rely on any documents they did not produce. You also stated that there may be supplemental productions but that you did not know when or how many documents. You further stated that you were not aware of any organizational charts but that you would continue to ask your clients, look for such documents, and produce them if you located them.

As to RFP No. 3, you stated that all of the shareholder reports for Display have been produced and that none are being withheld on the basis of any objections. As to Group, you said that none exists. Plaintiffs inquired as to the existence of any similar periodic operational reports to the Chinese government or commissions. You agreed to inquire.

In connection with RFPs Nos. 4, 5, and 6, Plaintiffs requested “all documents” whereas the Irico Defendants agreed to produce documents “sufficient to show.” Plaintiffs reserved their rights with respect to these RFPs to the extent that documents “sufficient to show” are inadequate, following Plaintiffs’ review of the documents along with the specific citations in interrogatories. As to RFPs Nos. 4 and 5, Plaintiffs may disagree with the Irico Defendants on the question of how specific documents need to be regarding “supervision” by the Chinese government. As to RFP No. 6, Plaintiffs and the Irico Defendants disagree about what communications should be produced and thus are at an impasse.

The parties are also at an impasse with respect to RFP No. 7. You stated that the Irico Defendants will not produce any documents in response to this RFP requesting documents related to the Irico Defendants’ belief that they were immune from suit in the United States. Plaintiffs’ position is that the Irico Defendants put such documents at issue in the Motion to Set Aside Default and therefore they are relevant.

As to RFP No. 8, Plaintiffs’ position is that pricing is relevant to the FSIA “direct effects” analysis. You stated that the Irico Defendants’ position is that pricing is not at issue at this time and therefore they would stand on their objections unless it could be narrowly tailored. Plaintiffs suggested limiting document production to agreed-upon custodians. You agreed to take this suggestion under consideration.

Regarding RFP No. 9, you stated that the Irico Defendants would produce the requested documents if they exist, although you stated that you do not know if they do. Plaintiffs’ view is that such documents would include marketing efforts.

Stuart C. Plunkett

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Plaintiffs and the Irico Defendants are at issue with respect to RFP No. 10 which requested “[a]ll documents related to any Meeting identified in Exhibit 11 to the Declaration of R. Alexander Saveri dated January 11, 2018 (including but not limited to any communications by, between, or among any directors, officers, or Employees of Group or Display related to such Meetings).” Plaintiffs explained that this RFP is relevant to the commercial activity exception of the FSIA and is narrowly tailored to meetings already identified. We asked whether your client had collected these documents already. You did not answer.

In response to Plaintiffs’ questions regarding the Irico Defendants’ unwillingness to respond to discovery about their participation in the CRT conspiracy, you stated the following Ninth Circuit cases support the proposition that participation in a global conspiracy is insufficient “directness” for the purposes of the FSIA “direct effects” test:

- *Adler v. Federal Republic of Nigeria*, 107 F.3d 720 (9th Cir. 1997);
- *California v. NRG Energy Inc.*, 391 F.3d 1011 (9th Cir. 2004);
- *Corzo v. Banco Cent. de Reserva del Peru*, 243 F.3d 519 (9th Cir. 2001);
- *Terenkian v. Republic of Iraq*, 694 F.3d 1122 (9th Cir. 2012); and
- *U.S. v. LSL Biotechnologies*, 379 F.3d 672 (9th Cir. 2004).

You also stated that the Court incorrectly applied the FTAIA standard to its FSIA direct effects analysis in its Order Setting Aside Default, ECF No. 5240. You noted that this list of cases does not represent all of the case law that supports the Irico Defendants’ position or on which the Irico Defendant intend to rely.

As to RFP No. 11, you stated that the Irico Defendants produced all documents that Wenkai Zhang reviewed on relied on in preparing his declaration. In response to Plaintiffs’ inquiry, you also stated that the Irico Defendants are not withholding any documents on the basis of any privilege.

Regarding RFP No. 12, there is no disagreement except as bound up with the Interrogatory Responses.

Thank you.

Very truly yours,

s/ Geoffrey C. Rushing

Geoffrey C. Rushing

Cc: John Taladay
Erik T. Koons
Thomas E. Carter
Ashley Eickhof

Stuart C. Plunkett

6/5/2018

Page 6

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June 21, 2018

VIA EMAIL

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Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917,*
Master File No. 07-CV-5944-JST

Dear Stuart:

This letter follows up on our meet and confer calls on May 29, May 30, and June 1, 2018 regarding the Irico Defendants' Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Interrogatories (May 4, 2018) and the Irico Defendants' Objections and Responses to Direct Purchaser Plaintiff Studio Spectrum, Inc.'s First Set of Requests for Production of Documents (May 4, 2018), and my June 5, 2018 letter to you memorializing the same. As set forth below, during our meet and confer discussions, you indicated that you would make certain inquiries and/or consider certain requests by Direct Purchaser Plaintiffs ("Plaintiffs"). Plaintiffs request that you please advise us immediately of the results of your inquiries and/or considerations.

Preliminarily, you advised during our meet and confer that there may be supplemental productions of documents but that you did not know when or how many documents. Please let us know if this information has changed since our meet and confer.

RFP No. 1

You agreed to inquire whether the documents produced in response to RFP No. 1 cover the creation and corporate status of Group and Display as of November 26, 2007, in light of Plaintiffs' concern that, to the extent possible, the Irico Defendants produce the articles of incorporation that were in effect on or around November 26, 2007. You agreed to provide more information and ensure that your clients produced all such documents in their possession. Do you have further information, and have your clients produced all documents in their possession?

Stuart C. Plunkett
6/21/2018
Page 2

RFP No. 2

You agreed to ask your clients about the existence of any organizational charts, look for such documents, and produce them if you located them. Have identified any such documents? If so, when they will be produced?

RFP No. 3

You agreed to inquire about the existence of periodic operational reports submitted to the Chinese government (or its commissions) by Group, similar to the Display shareholder reports that have been produced in response to RFP No. 3. Have you located any such reports? If so, when they will be produced?

RFP No. 8

In response to the Irico Defendants' concerns regarding the breadth of RFP No. 8, Plaintiffs suggested limiting the production of documents related to pricing to a few custodians to be agreed upon. You stated that you would take this suggestion under consideration. Please advise whether your clients would be amenable to such an approach.

RFP No. 9

Regarding RFP No. 9, you described extensive paper records located in China of worldwide sales, and you stated that there were no complete summary records. It is also unclear to Plaintiffs what records exist in electronic form. You further indicated that you would need to discuss such records with your clients and vendor before you could provide detail—e.g., can they be imaged?—about the available records. Plaintiffs requested that you investigate what summaries and backup exist, whether in electronic or paper form, as well as the existence of documents related to U.S. marketing efforts. Please let us know what documents and/or information you have located, and when you would produce any such records. Please also inform us whether the paper records located in China will be produced, or whether you will make them available to Plaintiffs in China.

RFP No. 10

During our meet and confer, Plaintiffs asked whether your clients have already collected documents called for by RFP No. 10. You did not answer. Please advise if such documents have been collected.

Stuart C. Plunkett

6/21/2018

Page 3

Thank you.

Very truly yours,

s/ Geoffrey C. Rushing

Geoffrey C. Rushing

Cc: John Taladay
Erik T. Koons
Thomas E. Carter
Ashley Eickhof
Kaylee Yang
Mario N. Alioto
Lauren C. Capurro
Christopher T. Micheletti
Joseph M. Patane

crt.696

EXHIBIT 11

BAKER BOTTS LLP

101 CALIFORNIA ST. SUITE 3600 SAN FRANCISCO, CALIFORNIA 94111	AUSTIN BEIJING BRUSSELS DALLAS DUBAI TEL +1.415.291.6200 FAX +1.415.291.6300 BakerBotts.com	LONDON MOSCOW NEW YORK PALO ALTO RIYADH HONG KONG HOUSTON SAN FRANCISCO WASHINGTON
--	--	---

Stuart C. Plunkett
TEL: 415.291.6203
FAX: 415.291.6303
stuart.plunkett@bakerbotts.com

June 15, 2018

VIA E-MAIL

Guido Saveri (E-mail: guido@saveri.com)
R. Alexander Saveri (E-mail: rick@saveri.com)
Geoffrey C. Rushing (E-mail: grushing@saveri.com)
Cadio Zirpoli (E-mail: cadio@saveri.com)
Matthew D. Heaphy (E-mail: mheaphy@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200
San Francisco, CA 94111

Re: *In re: Cathode Ray Tube (CRT) Antitrust Litigation -*
Master File No. 3:07-cv05944-JST; MDL No. 1917

Dear Counsel:

We have identified documents within Irico's May 4, 2018 production that are attorney-client privileged and protected by the work product doctrine. These inadvertently produced documents are Bates labeled IRI-CRT-00000741 and IRI-CRT-00000810-852. Pursuant to Paragraph 12 of the Stipulated Protective Order, we request that Plaintiffs immediately return and/or confirm destruction of all copies of these documents.

Please confirm in writing that Plaintiffs will take the steps requested above in accordance with the Protective Order.

Sincerely,



Stuart C. Plunkett

cc: Mario N. Alioto (malioto@tatp.com)
Lauren C. Capurro (laurenrussell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)

EXHIBIT 12

SAVERI & SAVERI, INC.
706 SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 217-6810
TELECOPIER: (415) 217-6813

June 20, 2018

VIA EMAIL

Stuart C. Plunkett
Baker Botts LLP
101 California Street, Suite 3600
San Francisco, California 94111
stuart.plunkett@bakerbotts.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917,*
Master File No. 07-CV-5944-JST

Dear Stuart:

Your letter of June 15, 2018 requests the destruction or return of certain documents pursuant to paragraph 12 of the Protective Order. We have questions about the basis for your assertion that these documents are privileged.

All of the documents are spreadsheets that appear to contain CRT sales information imported from other electronic records. The metadata for the documents indicate that the custodian for each is the “Irico Corporate Archives.” The documents contradict your representations during our meet and confer discussions that your current understanding was that the Irico Defendants did not have relevant sales data in summary form or in electronic form.

Based on our review prior to receipt of your letter, the documents show sales to the United States during the class period totaling almost \$2 million. The documents therefore also contradict your clients’ assertions that they had no sales to the United States during the class period. (They also show sales to Canada and Mexico in excess of \$3 million.)

Your letter also fails to set forth the basis for the claims that the documents are protected by the attorney-client privilege and/or the work product rule. Indeed, you have provided no information about the documents (e.g., author, date, recipients, etc.). *See e.g.*, Fed. R. Civ. P. 26(b)(5)(A)(2) (party asserting privilege must “describe the nature of the documents, communications, or tangible things not produced or disclosed—and do so in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim”).

Furthermore, the documents do not appear to be privileged. First, none of the documents appear to be a confidential communication with your clients. On their face, therefore, there is no basis for the assertion of attorney-client privilege.

Stuart C. Plunkett

6/20/2018

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Second, the documents also do not appear to be subject to the work product rule. Based on Plaintiffs' prior review, they do not contain attorney mental impressions. Again, they appear to summarize sales to various countries during the class period. The sales data itself is not protected by the work product rule (or any privilege). To the extent your clients are taking the position that compilations of this data are work product, it is contradicted by the metadata which indicates that the documents come from your clients' archival records.

Third, your clients' demand that evidence of the Irico Defendants' U.S. CRT sales be removed from the record, coupled with their refusal to meaningfully respond to Plaintiffs' discovery into this issue, is an abuse of the discovery process. You have made clear that your clients' contention that they have never sold CRTs into the United States is the principal basis for their position that they are immune under the FSIA. *See, e.g.*, ECF No. 5215 at 12 (citing paragraph 11 of the Zhang Declaration); ECF No. 5229 at 1 ("Certainly DPPs can make no such [direct effect] showing since Irico never sold products, directly or indirectly, to the United States"). You have, however, failed to meaningfully respond to Plaintiffs' discovery going to this issue.¹

More than three months since this discovery was propounded, your clients have provided no meaningful substantive responses to an interrogatory seeking a description of your clients' U.S. sales or to a document request seeking sales records, except for the documents you now seek to claw back.² Instead, your position is that your clients will "produce or make available for inspection business records from which the answer to this interrogatory may be determined." When asked at our meet and confer discussions what this meant, you stated that your clients may simply make available for Plaintiffs' review in China more than 100 double-sized boxes of Chinese language invoices relating to their *worldwide* sales of CRTs during the class period.

In sum, your clients appear to propose removing from the record evidence of U.S. sales, while forcing Plaintiffs, to the extent they seek to challenge your clients' claims that they never sold CRTs into the United States, to spend hundreds of hours reviewing hundreds of thousands of foreign language invoices, the vast majority of which will not relate to United States sales.

In light of the foregoing, Plaintiffs request that the Irico Defendants withdraw their clawback request. If they refuse, Plaintiffs intend to move for an order that the documents are not privileged. In addition, please immediately provide the following:

¹ Interrogatory No. 20 asks your clients to describe their sales to the United States during the Class Period. Request for Production No. 9 called for "All documents related to the sale or pricing of CRTs in the United States (including but not limited to any actual, planned, or contemplated sales of CRTs in the United States by Group, Display, or any affiliate of Group or Display, either directly or indirectly) during the Class Period."

² In your letter of June 4, 2018, you identified some of the documents in issue as supporting your response to Interrogatory No. 20.

Stuart C. Plunkett

6/20/2018

Page 3

1. An explanation of the factual basis for your claims of attorney-client privilege and/or work product protection;
2. A full substantive response to Interrogatory No. 20; and
3. All documents and data relating to sales of CRTs into North America during the class period.

Because it provides no meaningful basis for the claims of privilege, Plaintiffs do not believe your letter of last Friday satisfies the Stipulated Protective Order. Nonetheless, Plaintiffs will delete/destroy all copies of the “clawed back” documents, except for one sequestered copy, and one copy we are sending to Judge Walker today.

Thank you.

Very truly yours,

s/ Geoffrey C. Rushing

Geoffrey C. Rushing

Cc: John Taladay
Erik T. Koons
Thomas E. Carter
Ashley Eickhof
Kaylee Yang
Mario N. Alioto
Lauren C. Capurro
Christopher T. Micheletti
Joseph M. Patane

crt.693

EXHIBIT 13

SAVERI & SAVERI, INC.
706 SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 217-6810
TELECOPIER: (415) 217-6813

June 20, 2018

VIA HAND DELIVERY

The Honorable Vaughn R. Walker
Law Office of Vaughn R. Walker
Four Embarcadero Center, Suite 2200
San Francisco, CA 94111

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917,*
Master File No. 07-CV-5944-JST

Dear Judge Walker:

By letter dated June 15, 2018, the Irico Defendants identified documents they claim are protected by attorney-client privilege and the work product doctrine that were inadvertently produced to Direct Purchaser Plaintiffs (“Plaintiffs”). The Irico Defendants have requested that Plaintiffs return or destroy all copies of the documents in accordance with section 12 of the Stipulated Protective Order entered in this action (ECF No. 306). The Stipulated Protective Order requires the Receiving Party to return (or destroy) the documents within three business days of notification of the inadvertent production.

The Irico Defendants have provided no explanation or factual support for their claims that the documents in question are privileged or protected work product, and the documents do not appear to be entitled to protection from discovery. Nonetheless, Plaintiffs will delete/destroy all copies of the “clawed back” documents, except for one sequestered copy, and the enclosed copy. In addition, Plaintiffs have asked the Irico Defendants to reconsider their attorney-client and work product designations, and to provide additional information regarding the documents. If the Irico Defendants maintain their privilege and work product claims following meet and confer, Plaintiffs will submit to Your Honor a motion to compel production of the disputed documents pursuant to Rule 26(b)(5)(B) of the Federal Rules of Civil Procedure.

Enclosed herewith is a USB drive containing the Irico Defendants’ first production of documents (produced May 4, 2018; corrected May 30, 2018), including the documents in issue. Plaintiffs request that Your Honor maintain this copy of the document production until the parties notify you that they have resolved the dispute, or until it has been resolved by the Court.

The Honorable Vaughn R. Walker

6/20/2018

Page 2

Very truly yours,

s/R. Alexander Saveri

R. Alexander Saveri

Lead Counsel for Direct Purchaser Plaintiffs

Enclosure.

Cc: Lillian Tom (via email without enclosure)
Jay Weil (via email without enclosure)
John Taladay (via email without enclosure)
Erik T. Koons (via email without enclosure)
Stuart C. Plunkett (via email without enclosure)
Thomas E. Carter (via email without enclosure)
Ashley Eickhof (via email without enclosure)
Kaylee Yang (via email without enclosure)
Mario N. Alioto (via email without enclosure)
Lauren C. Capurro (via email without enclosure)
Christopher T. Micheletti (via email without enclosure)
Joseph M. Patane (via email without enclosure)

crt.694

EXHIBIT 14

BAKER BOTTS LLP

101 CALIFORNIA ST. SUITE 3600 SAN FRANCISCO, CALIFORNIA 94111	AUSTIN BEIJING BRUSSELS DALLAS DUBAI	LONDON MOSCOW NEW YORK PALO ALTO RIYADH
TEL +1.415.291.6200 FAX +1.415.291.6300	HONG KONG HOUSTON	SAN FRANCISCO BakerBotts.com

Stuart C. Plunkett
TEL: 415.291.6203
FAX: 415.291.6303
stuart.plunkett@bakerbotts.com

June 29, 2018

VIA E-MAIL

Geoffrey C. Rushing (E-mail: grushing@saveri.com)
Matthew D. Heaphy (E-mail: mheaphy@saveri.com)
Guido Saveri (E-mail: guido@saveri.com)
R. Alexander Saveri (E-mail: rick@saveri.com)
Cadio Zirpoli (E-mail: cadio@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200
San Francisco, CA 94111

Re: *In re: Cathode Ray Tube (CRT) Antitrust Litigation -*
Master File No. 3:07-cv05944-JST; MDL No. 1917

Dear Geoffrey:

I write in response to your letter of June 20, 2018 requesting more information regarding Irico's June 15, 2018 clawback request.

Irico withdraws its clawback request with respect to the documents Bates labeled IRI-CRT-00000810-852. These files are not summaries of Irico's sales records; rather, they are public data obtained from regional export authorities. As such, the custodian label "Irico Corporate Archives" was incorrectly applied during processing and production of these files. These files also do not show sales to the United States by the Irico Defendants. The exports were made by China National Electronics Import & Export Caihong Co.

Irico maintains its clawback request with regard to the document Bates labeled IRI-CRT-00000741. This document was created by Irico in connection with this litigation and at the request of counsel, for the purpose of summarizing relevant evidence under the Foreign Sovereign Immunities Act, and is thus protected under the work product doctrine. *See Fed. R. Civ. P. 26(b)(3)(A)* ("[A] party may not discover documents . . . prepared in anticipation of litigation . . . by or for another party or its representative . . ."); *Lewis v. Wells Fargo & Co.*, 266 F.R.D. 433, 439-40 (N.D. Cal. 2010) ("[T]he [work product] doctrine may be applied to documents

BAKER BOTTS LLP

June 29, 2018

created by non-attorneys so long as they are prepared ‘by or for another party or its representative’ and they are created ‘in anticipation of litigation.’”).

Sincerely,



Stuart C. Plunkett

cc: Mario N. Alioto (malioto@tatp.com)
Lauren C. Capurro (laurenrussell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)

EXHIBIT 15

Matthew Heaphy

From: Tom.Carter@BakerBotts.com
Sent: Friday, June 29, 2018 6:02 AM
To: Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com; Rick Saveri; Geoff Rushing; Cadio Zirpoli; malioto@tatp.com; laurenrussell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; reilly.stoler@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST
Attachments: Irico Supplemental Response to Potential Deponent Info Request.pdf

Dear Matt & Geoff:

Please see the attached supplemental response by Irico to your information request regarding potential deponents. Irico disputes the contention in your June 21, 2018 letter that we agreed to provide all the information described in your letter regarding the individuals listed in our Interrogatory responses, and such information is not required under the Court's Order Re Discovery and Case Management Protocol (Dkt. 1128). However, Irico is providing information below on these employees' current or most recent title, and will search for and provide information on prior positions held by each employee that are relevant to their knowledge of information covered by Irico's Interrogatory responses.

1. Guo Mengquan (former employee, retired May 2017): former Deputy General Manager, Irico Group
2. Hou Ruijin (current employee): Asset Manager, Irico Group
3. Long Tao (current employee): Secretary of the office of Board of Directors, Irico Display
4. Yan Yunlong (current employee): General Counsel, Irico Group
5. Zhang Shaowen (former employee, retired Mar. 2016) - former Deputy General Manager, Irico Group
6. Zhu Xiaohang (current employee): Secretary of the office of Board of Directors, Irico Electronics

Best,
Tom Carter

From: Matthew Heaphy <mheaphy@saveri.com>
Sent: Thursday, June 21, 2018 6:35 PM
To: Carter, Tom <Tom.Carter@BakerBotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Rick Saveri <Rick@saveri.com>; Geoff Rushing <Geoff@saveri.com>; Cadio Zirpoli <cadio@saveri.com>; malioto@tatp.com; laurenrussell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; Stoler, Reilly <reilly.stoler@bakerbotts.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,
Matt

Matthew Heaphy
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
mheaphy@saveri.com
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

From: Tom.Carter@BakerBotts.com [mailto:Tom.Carter@BakerBotts.com]
Sent: Tuesday, June 19, 2018 5:30 PM
To: Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com; Rick Saveri; Geoff Rushing; Cadio Zirpoli; malioto@tatp.com; laurenrussell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; reilly.stoler@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Please see the attached for additional information Irico has gathered in response to your request regarding potential Irico deponents.

Best,
Tom Carter

From: Carter, Tom
Sent: Friday, June 8, 2018 12:39 PM
To: 'Matthew Heaphy' <mheaphy@saveri.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; 'Rick Saveri' <Rick@saveri.com>; 'Geoff Rushing' <Geoff@saveri.com>; 'Cadio Zirpoli' <cadio@saveri.com>; 'malioto@tatp.com' <malioto@tatp.com>; 'laurenrussell@tatp.com' <laurenrussell@tatp.com>; 'jpatane@tatp.com' <jpatane@tatp.com>; 'CMicheletti@zelle.com' <CMicheletti@zelle.com>; Stoler, Reilly <reilly.stoler@bakerbotts.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Irico is working on gathering last known addresses for all the former employees on your list that are not currently represented by us, and we expect to have those for you by next week at the latest. With regard to the individuals identified as having knowledge in Irico's interrogatory responses, all of them are represented by us and may be contacted through counsel. With the exception of Mr. Guo Mengquan and Mr. Zhang Shaowen, all of these individuals are current employees of Irico. We will also provide you with their current titles by next week.

Best regards,
Tom Carter

From: Matthew Heaphy <mheaphy@saveri.com>
Sent: Thursday, June 7, 2018 3:18 PM
To: Carter, Tom <Tom.Carter@BakerBotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Rick Saveri <Rick@saveri.com>; Geoff Rushing <Geoff@saveri.com>; Cadio Zirpoli <cadio@saveri.com>

<cadio@saveri.com>; malioto@atp.com; laurenrussell@atp.com; jpatane@atp.com; CMicheletti@zelle.com

Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,
Matt

Matthew Heaphy
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
mheaphy@saveri.com
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

From: Tom.Carter@BakerBotts.com [mailto:Tom.Carter@BakerBotts.com]
Sent: Tuesday, June 05, 2018 10:05 PM
To: Rick Saveri; Cadio Zirpoli; malioto@atp.com; laurenrussell@atp.com; jpatane@atp.com; CMicheletti@zelle.com; Geoff Rushing; Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Dear Counsel:

Please see attached for Irico's responses to the request in your April 9, 2018 letter regarding potential Irico deponents. Irico has identified the employment status (and departure date, if relevant) of 35 out of the 36 individuals named in your list. Irico has been unable to locate information regarding Liu Linghai; if you could share more detail on how Liu Linghai was chosen for your list, that may help with providing the information you requested. All current Irico employees and individuals identified in Irico's interrogatory responses will be represented by us and can be reached through counsel.

Given the large number of former Irico employees on the list, including many that left the company more than 5 years ago, we request that plaintiffs consider the information provided thus far and narrow the list so that Irico can better prioritize the burdensome task of reaching out to each of these former employees to determine if they would accept representation by counsel for Irico.

Thank you,

Tom Carter

Associate

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M +1.202.412.4352

The Warner
1299 Pennsylvania Ave NW

Washington, DC 20004
USA



Admitted to practice in New York and the District of Columbia.

From: Rick Saveri <Rick@saveri.com>
Sent: Monday, April 9, 2018 1:31 PM
To: Taladay, John <john.taladay@bakerbotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Geoff Rushing <Geoff@saveri.com>; Matthew Heaphy <mheaphy@saveri.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

John: Please see attached letter.

Rick

R. Alexander Saveri
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
Tel: (415) 217-6810
Fax: (415) 217-6813

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Irico's Supplemental Response to Potential Deponent Information Request

Name	Name (Chinese)	Current or Former Employee	Date of Departure	Contact Information/ Last Known Address
Chen Di Zhi	陈德智	Former	Apr. 2002	No address found
Chen Xiaoning	陈晓宁	Current	n/a	May be contacted through counsel
Duan Cheng	段诚	Former	June 2015	咸阳市人民路彩虹新区 152#-2-6-11 邮编 710021
Fang Liang-Jun	方良军	Former	June 2012	咸阳市人民路彩虹新区 113#-2-4-7 邮编 710021
Fu Jiuquan	符九全	Former	Mar. 2011	No address found
Gao Rong-Guo	高荣国	Current	n/a	May be contacted through counsel
Ge Di	葛迪	Former	May 2016	咸阳市秦都区渭滨街道阳光小区 10 号楼 邮编 710021
Guo Mengquan	郭盟权	Former	May 2017	May be contacted through counsel
Li Wei-Sheng	李卫生	Former	Jan. 2002	No address found
Liang Yuan	梁援	Former	Mar. 2014	咸阳市人民路彩虹小区 5-1-3-5 邮编 710021
Liu Hongwu	刘宏武	Former	Jan. 2014	No address found
Liu Linghai				No information found
Liu Xiaodong	刘晓东	Former	May 2010	No address found
Ma Jinquan	马金泉	Former	Feb. 2005	咸阳市人民路/彩虹新区 115#-1-5-10 邮编 710021
Niu Xinan	牛新安	Former	Dec. 2015	咸阳市人民路彩虹新区 115#-2-5-东户 邮编 710021
Shan or Sa Tao	沙涛	Former	Dec. 2002	No address found
Shen Xiaolin	申小琳	Former	Oct. 2015	咸阳市人民路彩虹新区 115#-1-5-10 邮编 710021
Song Shi-Zhen	宋世振	Former	Nov. 2004	咸阳市彩虹一路彩虹老区 52#-4-3-6 邮编 710021
Su Xiaohua	苏晓华	Current	n/a	May be contacted through counsel
Tao Kui	陶魁	Former	Mar. 2014	No address found
Wang Da-Ming	王大明	Former	July 2004	No address found
Wang Li Guang	王李广	Former	Apr. 2002	No address found
Wang Ping-Quan	王平权	Former	Mar. 2012	咸阳市人民路彩虹新区 137#-6-2-3 邮编 710021
Wang Zhao-Jie	王昭杰	Current	n/a	May be contacted through counsel
Wei Jian-She	魏建社	Former	Apr. 2018	珠海番溪庄 27-1-405 邮编 519000
Wei Zhiyuan	魏致远	Former	Sept. 2006	No address found

Irico's Supplemental Response to Potential Deponent Information Request

Name	Name (Chinese)	Current or Former Employee	Date of Departure	Contact Information/Last Known Address
Wen Haiyang	文海洋	Former	Sept. 2017	咸阳市彩虹一路彩虹新家园 B 座 1 单元六层 12 号 邮编 710021
Xi Jiansheng	奚建生	Former	Apr. 2006	No address found
Xing Daoqin	邢道钦	Deceased	Dec. 2011	n/a
Xu Gao-Wen	许高文	Former	Oct. 2014	咸阳市彩虹一路彩虹小区 85#-3-3-5 邮编 710021
Yao Jun	姚军	Former	Apr. 2018	咸阳市建设路彩虹北家属区 70 号楼 邮编 710021
Zhang Junhua	张君华	Current	n/a	May be contacted through counsel
Zhang Shaowen	张少文	Former	Mar. 2016	May be contacted through counsel
Zhang Hushan	张虎山	Former	May 2018	咸阳市人民西路彩虹劳司 E-1-8-16 邮编 710021
Zhen Xiao-Hong	甄小红	Former	Feb. 2014	No address found
Zhu Jian	竺简	Former	Dec. 1998	No address found

EXHIBIT 16

Cadio Zirpoli

From: Simpkins, Philip A. <philip.simpkins@pillsburylaw.com>
Sent: Thursday, January 15, 2009 05:50 PM
To: Cadio Zirpoli; Joe Patane
Cc: Tiffany, Joseph R.; Callan, Terrence A.
Subject: IRICO Response to Plaintiffs' Requests for Sales Information
Attachments: JRT Cover Letter.pdf; IRICO Defendants' Response.pdf; Export Information for IRICO Companies .pdf

Counsel,

Please see the attached Response from the IRICO Defendants, including a spreadsheet of export information bates stamped as IRICO-00001 - IRICO-00022, with accompanying cover letter. The original cover letter and hard copies of the documents will follow by mail.

<<JRT Cover Letter.pdf>> <<IRICO Defendants' Response.pdf>> <<Export Information for IRICO Companies .pdf>>

Regards,
Phil Simpkins

Philip Simpkins
Pillsbury Winthrop Shaw Pittman LLP

Tel: 650.233.4655 | Fax: 650.233.4545
2475 Hanover Street | Palo Alto, CA 94304-1114

Email: Philip.Simpkins@pillsburylaw.com
www.pillsburylaw.com



Pillsbury Winthrop Shaw Pittman LLP
2475 Hanover Street | Palo Alto, CA 94304-1114 | tel 650.233.4500 | fax 650.233.4545

Joseph R. Tiffany II
tel 650.233.4644
joseph.tiffany@pillsburylaw.com

January 15, 2009

Via Email & First Class Mail

Cadio Zirpoli, Esq.
Saveri & Saveri, Inc.
111 Pine Street, Suite 1700
San Francisco, California 94111

Joseph M. Patane, Esq.
Law Office Of Joseph M. Patane
2280 Union Street
San Francisco, CA 94123

Re: *In re CRT Antitrust Litigation*, case no. 3:07-cv-5944 SC

Dear Cadio and Joe:

Following up on our discussions with each of you, I enclose the Response of IRICO Group Corporation and IRICO Display Devices Co., Ltd. ("IRICO Companies") to Plaintiffs' Information Requests ("Response"). We are providing this information in connection with our discussions with you regarding the tolling agreement among the direct and indirect purchaser plaintiffs and the IRICO Companies. We believe the information provided confirms that the IRICO Companies should not be named as defendants in the consolidated complaints.

We have the following additional comments regarding the Response:

- (1) We understand from the IRICO Companies that they possess relatively little accessible information concerning their historical sales. IRICO has explained that some of the difficulties in more quickly gathering historical sales data resulted from multiple reorganizations over the relevant time period. As described in the enclosed Response, the most significant of these restructuring occurred in 2004 when a new subsidiary was formed to handle sales and export functions for all the IRICO Companies.

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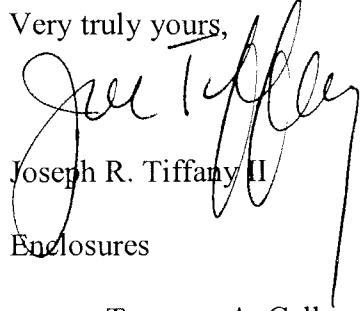
Cadio Zirpoli, Esq.
Joseph M. Patane, Esq.
January 15, 2009
Page 2

- (2) We further understand that the overlapping nature of the IRICO Companies' business lines and problems in their record-keeping system also contributed to the delay in producing data. Economic conditions in general, and in the CRT business particularly, have also limited their available resources for information gathering. In responding to your questions, the IRICO Companies also relied in part on the recollections of salespersons responsible for the sale of CRTs.
- (3) With regard to sales to distributors or other third-party intermediaries, the IRICO Companies do not gather information from such customers regarding such customers' sales or distribution of IRICO CRTs or their integration of IRICO CRTs into other products. As such, the IRICO Companies lack information regarding the distribution of IRICO CRTs beyond their direct customers.

We understand that you will need some time to review the Response. We hope that you are agreeable to a further three-week extension of time regarding the IRICO Companies' response to plaintiffs' pending requests while you are conducting your review. Please confirm your agreement to such an extension for this purpose.

We would be happy to meet with you further if there are any remaining questions and to finalize the tolling agreement.

Very truly yours,


Joseph R. Tiffany II
Enclosures

cc: Terrance A. Callan

**CONFIDENTIAL INFORMATION
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**RESPONSE OF IRICO GROUP CORPORATION
AND IRICO DISPLAY DEVICES CO., LTD.
TO PLAINTIFFS' INFORMATION REQUESTS**

IRICO Group Corporation and IRICO Display Devices Co., Ltd. ("IRICO Defendants") provide the following information in connection with the discussions with interim lead counsel for the direct purchaser plaintiffs and the indirect purchaser plaintiffs regarding tolling agreements pursuant to which the IRICO Defendants would not be named as defendants in the consolidated complaints to be filed by plaintiffs later this year. The IRICO Defendants designate the information included in this response, the accompanying cover letter, and the attached export information as "Confidential" under the terms of the Stipulated Protective Order entered by the Court on June 18, 2008.

A. Background re IRICO's Manufacture and Sale of CRTs and CRT Products.

IRICO Group Corporation is the parent company of the following companies that manufactured and sold CRTs between 1995 and the present:

IRICO Color Picture Tube Plant
IRICO Display Devices Co., Ltd.
IRICO Group Electronics Company Limited (established in 2004)
Xian Irizo Display Technology Co., Ltd. (established in 2004)

Prior to the formation of IRICO Group Electronics Company Limited ("IRICO Electronics") in September 2004, IRICO Color Picture Tube Plant and IRICO Display Devices Co., Ltd. sold CRT products through the sales department of IRICO Group Corporation. IRICO Group Corporation exported products exclusively through China National Electronics Imp. & Exp. Caihong Co., an unrelated state-owned enterprise.

After its formation in 2004, IRICO Electronics handled all domestic sales and exports of CRTs for the IRICO Companies. For a short period of time during the transition of sales and exports from IRICO Group Corporation to IRICO Electronics, Xian Irizo Display Technology Co., Ltd. also exported CRTs.

IRICO Group Corporation acquired a bankrupt enterprise in Xi'an, which was then renamed Xian Caihong Electrical Co., Ltd. This company manufactured CRT TV sets under the brand of "IRICO" from 1996 to 1999. These TV sets were only sold in China. Xian Caihong Electrical Co., Ltd. was dissolved in 1999.

B. The IRICO Companies' Foreign Customers.

The IRICO Companies have advised that complete historical customer data is not available. The IRICO Companies have been able to locate records of their CRT exports from 2000 to the present. Attached to this Response and incorporated herein is a spreadsheet containing the available export information. Please note that this export information has been translated from Chinese to English and formatted for your convenience.

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The spreadsheet of export information shows the quantities of units exported and the destination country together with the name of the exporting company. For records of 2005 and before, the export records show that China National Electronics Imp. & Exp. Caihong Co. was the exporting company. As described above, this is the state-owned enterprise through which the IRICO Companies exported products prior to the formation of IRICO Electronics. The available export records did not track the name of the customer that ordered the CRTs or the location of such customer. It should be noted that the "Company Code" column refers to the IRICO company that exported the CRTs, rather than the purchasing customer.

As the attached export information shows, between 2000 and 2008 the IRICO Companies made only two shipments of CRTs to the United States, totaling 2018 units. As described below, these units were only samples that IRICO planned to use to explore the potential for sales opportunities in the United States. They were never sold and were eventually shipped back to China. The IRICO Companies have never sold CRTs to United States customers nor exported CRTs to the United States at the request of any customer.

The IRICO Companies' foreign customers are as follows:

Turkey:	Vestel Elektronik Sanayi Ve Ticaret A.S. Arcelik A.S. Profilo Telra Elektronik San. Ve Tic A.S. Shov Elektronik Sanayi Ve Ticaret A.S.
Hong Kong:	Irisonic (H.K.) Co., Ltd. Centry Electronics Asia Co., Ltd. Hong Way Enterprise Limited
India:	Dixon Technologies (India) Pvt. Ltd. Salora International Ltd. L.B. Electronics Oscar Group of Companies Super Palstronics Pvt. Ltd Super Cassettes Industries Limited Mirc Electronics Limited (Onida) Videotex International Pvt. Ltd. Videocon Industries Limited PG Group Asia Lucky Industrial Limited Beltek (India) Limited Bharti Electronics Super Speed Limited (SGV)
Brazil:	Semp-Toshiba S.A. (samples only)

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Egypt: Toyoichi Tsusho Co., Ltd.
El Araby Co.

Argentina: Newsan S.A.
Radio Victoria Fueguina S.A.
Ambassador Fueguina S.A.

Please note that it was not unusual for the IRICO Companies to ship products to locations other than the country in which the ordering customer was located. Thus, while the IRICO Companies' foreign customers were located in the six countries referenced above, the export information provided herewith shows that the IRICO Companies shipped products to several other countries at the request of their purchasing customers.

In response to the inquiry from counsel for the indirect purchaser plaintiffs, the IRICO Companies do not have any customers in Mexico. The IRICO Companies did, however, make shipments of CRTs to third-parties in Mexico at the request of a Hong Kong customer named Irisonic (H.K.) Co., Ltd. These third-party shipments to Mexico took place between April 2004 and October 2005 and consisted of a total of just over 100,000 units at a total sales price of \$2.3 million USD. There was also one shipment of a single unit, presumably a sample, in March of 2002.

C. The IRICO Companies' Domestic Customers.

The IRICO Companies sell a high percentage (approximately 70 to 80%) of their CRTs in China. The IRICO Companies' CRT customers in China are:

1. Sichuan Changhong Electric Co., Ltd.
2. Konka Group Co., Ltd.
3. TCL Corporation
4. Skyworth Group Co., Ltd.
5. Hisense Electric Co. Ltd. Qingdao, China
6. Haier Electrical Appliances Co., Ltd.
7. Xiamen Overseas Chinese Electronic Co., Ltd.
8. Soyea Technology Co., Ltd.
9. Yisheng Technology Co., Ltd.
10. LG Electronics (Shenyang) Inc.
11. Hangzhou Jinlipu Electrical Co., Ltd.
12. Shenzhen Techtop Industrial Co., Ltd.
13. Suntrue International
14. Starlight Marketing Macao Commercial Offshore, Ltd.
15. Hangzhou Huashan Electric Co., Ltd.

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D. The IRICO Companies Have Not Sold CRTs in the United States.

As stated above, the IRICO Companies have never sold CRTs to companies in the United States or shipped products to the United States on behalf of a customer. According to the spreadsheet of export information, 2018 units were exported to the United States in 2002. Those items were samples of CDTs (CRTs for computer monitors) that were intended to be used to test the market for IRICO CDTs in the United States. The CDTs were never sold in the United States and were eventually shipped back to China for redistribution to a customer in China. The IRICO Companies ceased manufacturing CDTs in 2002.

E. The IRICO Companies Have No Business Relationships With Any of the Other Defendants.

The IRICO Companies have never entered into any joint venture or other cooperative business arrangement with any of the other defendants named in the *In re CRT Antitrust Litigation*, nor have they sold CRTs to any of the other defendants. As noted above, the IRICO Companies have shipped a small number of CRTs as samples, not sales, to Semp-Toshiba S.A. and have sold CRTs to LG Electronics (Shenyang) Inc., in China, which we understand to be subsidiaries of defendants in this litigation.

F. Antitrust Investigations by Government Authorities.

The IRICO Companies have not received any notice of investigation, grand jury subpoena, or inquiries from the United States Department of Justice. In December 2007, IRICO Electronics received a notice of antimonopoly investigation from the Canadian authority and IRICO Group Corporation received a notice of antimonopoly investigation from the European Commission. We are confirming that no further inquiry was made or any action was ever taken against the IRICO Companies by the EU or Canada

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Year	Month	Import/Export	Destination	Company Code	Company Name	Quantity	Total Prices (in USD)	Unit Price (in USD)
2008	1	Export	India	6104912068	IRICO Group Electronics Company Limited	18816	\$353,146	\$18.7684
2008	1	Export	Russia	6104912068	IRICO Group Electronics Company Limited	11296	\$238,432	\$21.1076
2008	1	Export	North Korea	6104912068	IRICO Group Electronics Company Limited	2	\$34	\$17.0000
2008	1	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	166560	\$3,372,691	\$20.2491
2008	1	Export	India	6101319074	IRICO Display Devices Co., Ltd.	48960	\$990,493	\$20.2307
2008	1	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	41664	\$875,977	\$21.0248
2008	1	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	16008	\$390,159	\$24.3728
2008	1	Export	Vietnam	6101319074	IRICO Display Devices Co., Ltd.	5760	\$172,800	\$30.0000
2008	1	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	5656	\$99,812	\$17.6471
2008	1	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	5280	\$142,560	\$27.0000
2008	1	Export	Vietnam	6101319074	IRICO Display Devices Co., Ltd.	4800	\$144,000	\$30.0000
2008	1	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	4600	\$71,300	\$15.5000
2008	1	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	3168	\$91,928	\$29.0177
2008	1	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	3072	\$172,032	\$56.0000
2008	1	Export	Indonesia	6101319074	IRICO Display Devices Co., Ltd.	30	\$945	\$31.5000
2008	1	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	4	\$174	\$43.5000
2008	2	Export	Thailand	6104912068	IRICO Group Electronics Company Limited	2304	\$35,966	\$15.6102
2008	2	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	131520	\$2,639,078	\$20.0660
2008	2	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	54736	\$1,235,327	\$22.5688
2008	2	Export	India	6101319074	IRICO Display Devices Co., Ltd.	31488	\$602,256	\$19.1265
2008	2	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	29024	\$839,302	\$28.9175
2008	2	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	8616	\$188,880	\$21.9220
2008	2	Export	Indonesia	6101319074	IRICO Display Devices Co., Ltd.	2304	\$35,712	\$15.5000
2008	2	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	2112	\$57,024	\$27.0000
2008	2	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	1992	\$57,512	\$28.8715
2008	2	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	1360	\$38,512	\$28.3176
2008	2	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	1056	\$29,040	\$27.5000
2008	2	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	5	\$157	\$31.4000
2008	2	Export	Japan	6101319074	IRICO Display Devices Co., Ltd.	2	\$52	\$26.0000
2008	3	Export	Kenya	6104912068	IRICO Group Electronics Company Limited	6900	\$106,950	\$15.5000
2008	3	Export	India	6104912068	IRICO Group Electronics Company Limited	2304	\$36,634	\$15.9002
2008	3	Export	Indonesia	6104912068	IRICO Group Electronics Company Limited	2304	\$35,712	\$15.5000
2008	3	Export	Thailand	6104912068	IRICO Group Electronics Company Limited	2304	\$35,599	\$15.4510
2008	3	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	113856	\$2,218,445	\$19.4847
2008	3	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	111264	\$2,412,241	\$21.6803
2008	3	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	22176	\$609,840	\$27.5000
2008	3	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	19520	\$543,574	\$27.8470
2008	3	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	9480	\$249,792	\$26.3494
2008	3	Export	India	6101319074	IRICO Display Devices Co., Ltd.	8832	\$200,812	\$22.7369
2008	3	Export	India	6101319074	IRICO Display Devices Co., Ltd.	5472	\$127,162	\$23.2387
2008	3	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	2304	\$35,712	\$15.5000
2008	3	Export	Ukraine	6101319074	IRICO Display Devices Co., Ltd.	2288	\$70,048	\$30.6154
2008	3	Export	White Russia	6101319074	IRICO Display Devices Co., Ltd.	2112	\$48,343	\$22.8897
2008	3	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	1056	\$28,512	\$27.0000
2008	3	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	1056	\$28,512	\$27.0000
2008	3	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	4	\$170	\$42.5000
2008	3	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	2	\$30	\$15.0000
2008	3	Export	India	6101319074	IRICO Display Devices Co., Ltd.	2	\$68	\$34.0000
2008	3	Export	Japan	6101319074	IRICO Display Devices Co., Ltd.	2	\$52	\$26.0000
2008	4	Export	Indonesia	6104912068	IRICO Group Electronics Company Limited	2304	\$36,634	\$15.9002
2008	4	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	44096	\$1,106,805	\$25.0999
2008	4	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	32736	\$574,350	\$17.5449
2008	4	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	28512	\$798,441	\$28.0037
2008	4	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	28464	\$637,616	\$22.4008
2008	4	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	27456	\$761,693	\$27.7423
2008	4	Export	Indonesia	6101319074	IRICO Display Devices Co., Ltd.	11808	\$310,262	\$26.2756
2008	4	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	6712	\$128,324	\$19.1186
2008	4	Export	India	6101319074	IRICO Display Devices Co., Ltd.	4416	\$97,901	\$22.1696
2008	4	Export	Indonesia	6101319074	IRICO Display Devices Co., Ltd.	4224	\$92,867	\$21.9856
2008	4	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	2304	\$35,712	\$15.5000
2008	4	Export	India	6101319074	IRICO Display Devices Co., Ltd.	1248	\$39,936	\$32.0000
2008	4	Export	Hong Kong	6101319074	IRICO Display Devices Co., Ltd.	1056	\$31,944	\$30.2500
2008	4	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	6	\$141	\$23.5000
2008	4	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	2	\$46	\$23.0000
2008	5	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	72080	\$1,975,256	\$27.4037
2008	5	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	15640	\$448,272	\$28.3000
2008	5	Export	Indonesia	6101319074	IRICO Display Devices Co., Ltd.	11328	\$207,514	\$18.3187
2008	5	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	10520	\$251,029	\$23.8621
2008	5	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	9440	\$323,216	\$34.2390
2008	5	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	5656	\$103,168	\$18.2405
2008	5	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	3360	\$66,749	\$19.8658
2008	5	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	3356	\$66,368	\$19.7759
2008	5	Export	Ukraine	6101319074	IRICO Display Devices Co., Ltd.	3184	\$86,476	\$26.8455
2008	5	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	2304	\$37,179	\$16.1367
2008	5	Export	India	6101319074	IRICO Display Devices Co., Ltd.	2112	\$59,136	\$28.0000
2008	5	Export	India	6101319074	IRICO Display Devices Co., Ltd.	2112	\$67,584	\$32.0000
2008	5	Export	Vietnam	6101319074	IRICO Display Devices Co., Ltd.	2112	\$64,753	\$30.6596
2008	5	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	2112	\$59,136	\$28.0000
2008	5	Export	India	6101319074	IRICO Display Devices Co., Ltd.	1056	\$29,568	\$28.0000

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IRICO-00001

Year	Month	Import/Export	Destination	Company Code	Company Name	Quantity	Total Prices (in USD)	Unit Price (in USD)
2008	5	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	16	\$960	\$60.0000
2008	5	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	2	\$60	\$30.0000
2008	6	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	69440	\$1,527,123	\$21.9920
2008	6	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	19392	\$497,835	\$25.6722
2008	6	Export	Tunisia	6101319074	IRICO Display Devices Co., Ltd.	9216	\$153,907	\$16.7000
2008	6	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	7392	\$209,194	\$28.3001
2008	6	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	2736	\$77,517	\$28.3322
2008	6	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	2304	\$35,712	\$15.5000
2008	6	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	2304	\$36,864	\$16.0000
2008	6	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	1	\$15	\$15.0000
2008	7	Export	Egypt	6101319074	IRICO Display Devices Co., Ltd.	38208	\$1,074,161	\$28.1135
2008	7	Export	Russia	6101319074	IRICO Display Devices Co., Ltd.	26624	\$645,755	\$24.2546
2008	7	Export	South Africa	6101319074	IRICO Display Devices Co., Ltd.	22176	\$633,706	\$28.5762
2008	7	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	15504	\$464,512	\$29.9608
2008	7	Export	Thailand	6101319074	IRICO Display Devices Co., Ltd.	12768	\$360,112	\$28.2043
2008	7	Export	Argentina	6101319074	IRICO Display Devices Co., Ltd.	10560	\$299,904	\$28.4000
2008	7	Export	Algeria	6101319074	IRICO Display Devices Co., Ltd.	4608	\$76,032	\$16.5000
2008	7	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	4606	\$75,999	\$16.5000
2008	7	Export	Kenya	6101319074	IRICO Display Devices Co., Ltd.	4600	\$75,900	\$16.5000
2008	7	Export	India	6101319074	IRICO Display Devices Co., Ltd.	4416	\$97,517	\$22.0827
2008	7	Export	Sudan	6101319074	IRICO Display Devices Co., Ltd.	2304	\$38,016	\$16.5000
2008	7	Export	Turkey	6101319074	IRICO Display Devices Co., Ltd.	115	\$2,741	\$23.8348
2008	7	Export	North Korea	6101319074	IRICO Display Devices Co., Ltd.	2	\$62	\$31.0000
2008	7	Export	Brazil	6101319074	IRICO Display Devices Co., Ltd.	1	\$31	\$31.0000

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2007-1-1	6101319074	IRICO Display Devices Co., Ltd.	Algeria	1390	\$39,505	\$28.4209
Export	2007-1-1	6101319074	IRICO Display Devices Co., Ltd.	Kenya	528	\$14,256	\$27.0000
Export	2007-1-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	864	\$43,632	\$50.5000
Export	2007-2-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	4224	\$157,550	\$37.2988
Export	2007-2-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	4032	\$130,287	\$32.3132
Export	2007-2-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1312	\$35,734	\$27.2363
Export	2007-2-1	6101319074	IRICO Display Devices Co., Ltd.	Bulgaria	1056	\$27,773	\$26.3002
Export	2007-2-1	6101319074	IRICO Display Devices Co., Ltd.	India	400	\$16,308	\$40.7700
Export	2007-3-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	16896	\$311,503	\$18.4365
Export	2007-3-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	4224	\$106,719	\$25.2649
Export	2007-3-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	576	\$22,302	\$38.7188
Export	2007-3-1	6101319074	IRICO Display Devices Co., Ltd.	Japan	2	\$130	\$65.0000
Export	2007-4-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	9504	\$235,699	\$24.8000
Export	2007-4-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	840	\$26,861	\$31.9774
Export	2007-4-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	512	\$29,696	\$58.0000
Export	2007-4-1	6101319074	IRICO Display Devices Co., Ltd.	India	5	\$285	\$57.0000
Export	2007-4-1	6101319074	IRICO Display Devices Co., Ltd.	North Korea	4	\$232	\$58.0000
Export	2007-5-1	6101319074	IRICO Display Devices Co., Ltd.	India	400	\$11,040	\$27.6000
Export	2007-5-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	7392	\$177,408	\$24.0000
Export	2007-5-1	6101319074	IRICO Display Devices Co., Ltd.	Kenya	2112	\$36,792	\$17.4205
Export	2007-5-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	1728	\$65,664	\$38.0000
Export	2007-5-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	576	\$28,224	\$49.0000
Export	2007-6-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	2520	\$77,342	\$30.6913
Export	2007-6-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1280	\$71,424	\$55.8000
Export	2007-6-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	2	\$65	\$42.5000
Export	2007-6-1	6101319074	IRICO Display Devices Co., Ltd.	India	1	\$59	\$59.0000
Export	2007-7-1	6101319074	IRICO Display Devices Co., Ltd.	India	2	\$122	\$61.0000
Export	2007-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	6304	\$183,472	\$29.1041
Export	2007-7-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	5280	\$121,440	\$23.0000
Export	2007-7-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	2304	\$87,552	\$38.0000
Export	2007-7-1	6101319074	IRICO Display Devices Co., Ltd.	Kenya	2112	\$32,515	\$15.3954
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	22176	\$521,664	\$23.5238
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	9504	\$224,928	\$23.6667
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	India	2113	\$51,352	\$24.3029
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1680	\$53,009	\$31.5530
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	1152	\$43,776	\$38.0000
Export	2007-8-1	6101319074	IRICO Display Devices Co., Ltd.	Tunisia	1056	\$21,098	\$19.9792
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	35904	\$866,764	\$24.1412
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	26368	\$668,556	\$25.3548
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	20064	\$481,536	\$24.0000
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	2880	\$109,440	\$38.0000
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	India	1056	\$26,400	\$25.0000
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Kenya	1056	\$13,949	\$13.2093
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	2048	\$99,511	\$48.5894
Export	2007-9-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	1	\$51	\$51.0000
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	44320	\$967,669	\$21.8337
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	13728	\$342,144	\$24.9231
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	India	1896	\$55,380	\$29.2089
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	Japan	2	\$44	\$22.0000
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	1	\$58	\$58.0000
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	20064	\$430,015	\$21.4322
Export	2007-10-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	8	\$178	\$22.2500
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	10560	\$274,560	\$26.0000
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3168	\$66,492	\$20.9886
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	2560	\$142,336	\$55.6000
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	2016	\$52,992	\$26.2857
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	India	1680	\$57,960	\$34.5000
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	33792	\$845,707	\$25.0268
Export	2007-11-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	24	\$617	\$25.7083
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	20928	\$528,557	\$25.2560
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	5280	\$147,014	\$27.8436
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	South Africa	5280	\$142,560	\$27.0000
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Kenya	1056	\$27,984	\$26.5000
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Argentina	1026	\$53,681	\$52.3207
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	India	18264	\$477,223	\$26.1292
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	India	2	\$56	\$28.0000
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	73368	\$1,832,166	\$24.9723
Export	2007-12-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	1	\$56	\$56.0000
Export	2007-1-1	6104912068	IRICO Group Electronics Company Limited	Egypt	4608	\$76,032	\$16.5000
Export	2007-1-1	6104912068	IRICO Group Electronics Company Limited	Russia	6912	\$112,666	\$16.3001
Export	2007-1-1	6104912068	IRICO Group Electronics Company Limited	Kenya	2736	\$50,933	\$18.6159
Export	2007-1-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$37,464	\$16.2604
Export	2007-1-1	6104912068	IRICO Group Electronics Company Limited	Jordan	1008	\$16,733	\$16.6002
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Russia	41520	\$1,130,866	\$27.2367
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Turkey	23040	\$735,144	\$31.9073
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	18624	\$550,264	\$29.5460
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Egypt	3312	\$123,534	\$37.2989
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Kenya	2304	\$35,712	\$15.5000

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	India	1418	\$57,815	\$40.7722
Export	2007-2-1	6104912068	IRICO Group Electronics Company Limited	Italy	4	\$173	\$43.2500
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Russia	84480	\$1,557,515	\$18.4365
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	10560	\$332,839	\$31.5188
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	India	9216	\$317,552	\$34.4566
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Kenya	6912	\$103,680	\$15.0000
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Turkey	4608	\$182,301	\$39.5618
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Czech Public	4608	\$71,424	\$15.5000
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Egypt	3312	\$83,677	\$25.2648
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Colombia	2304	\$34,560	\$15.0000
Export	2007-3-1	6104912068	IRICO Group Electronics Company Limited	Thailand	1920	\$91,211	\$47.5057
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	India	32256	\$512,803	\$15.8979
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	48384	\$999,207	\$20.6516
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	Kenya	13800	\$205,160	\$14.8667
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	Thailand	24	\$369	\$15.3750
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	India	10	\$300	\$30.0000
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	Turkey	20736	\$304,819	\$14.7000
Export	2007-4-1	6104912068	IRICO Group Electronics Company Limited	Turkey	4608	\$68,198	\$14.7999
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	India	14832	\$236,078	\$15.9168
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	India	2304	\$34,099	\$14.7999
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	India	32	\$594	\$18.5625
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Turkey	41472	\$584,756	\$14.1000
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Turkey	24	\$338	\$14.0833
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Russia	36144	\$569,554	\$15.7579
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Thailand	6912	\$101,875	\$14.7389
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Egypt	6912	\$102,761	\$14.8670
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4600	\$80,135	\$17.4207
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$33,046	\$14.3429
Export	2007-5-1	6104912068	IRICO Group Electronics Company Limited	South Africa	960	\$13,920	\$14.5000
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Turkey	41472	\$584,755	\$14.1000
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Russia	29344	\$511,440	\$17.4291
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Kenya	13800	\$198,720	\$14.4000
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	9216	\$133,199	\$14.4530
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Thailand	6912	\$102,080	\$14.7685
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	2304	\$34,099	\$14.7999
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	Colombia	2304	\$33,178	\$14.4002
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	India	40968	\$643,679	\$15.7118
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	India	4	\$84	\$21.0000
Export	2007-6-1	6104912068	IRICO Group Electronics Company Limited	India	62	\$2,182	\$35.1936
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	2304	\$34,099	\$14.7999
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Pakistan	2304	\$33,869	\$14.7001
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Colombia	2304	\$33,869	\$14.7001
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Russia	44752	\$852,989	\$19.0604
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	India	20696	\$365,910	\$17.6802
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Kenya	13812	\$212,645	\$15.3957
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	11520	\$167,040	\$14.5000
Export	2007-7-1	6104912068	IRICO Group Electronics Company Limited	Thailand	6912	\$101,875	\$14.7389
Export	2007-8-1	6104912068	IRICO Group Electronics Company Limited	Russia	26112	\$479,616	\$18.3676
Export	2007-8-1	6104912068	IRICO Group Electronics Company Limited	India	23113	\$409,600	\$17.7216
Export	2007-8-1	6104912068	IRICO Group Electronics Company Limited	Kenya	9216	\$132,710	\$14.4000
Export	2007-8-1	6104912068	IRICO Group Electronics Company Limited	Tunisia	1488	\$29,729	\$19.9792
Export	2007-8-1	6104912068	IRICO Group Electronics Company Limited	Germany	3	\$69	\$23.0000
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Turkey	80640	\$1,169,280	\$14.5000
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Russia	65984	\$1,115,894	\$16.9116
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Kenya	16128	\$213,047	\$13.2098
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Tunisia	4608	\$67,738	\$14.7001
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Czech Public	3312	\$49,018	\$14.8001
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2304	\$33,178	\$14.4002
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	2304	\$34,099	\$14.7999
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Colombia	2304	\$33,178	\$14.4002
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	Argentina	960	\$25,440	\$26.5000
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	India	5584	\$113,604	\$20.3446
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	India	13824	\$179,929	\$13.0157
Export	2007-9-1	6104912068	IRICO Group Electronics Company Limited	India	12	\$711	\$59.2500
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	71248	\$1,225,164	\$17.1958
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Kenya	16128	\$241,459	\$14.9714
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2980	\$78,414	\$27.2271
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2880	\$82,030	\$28.4826
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Malaysia	800	\$22,880	\$28.6000
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	India	58656	\$847,311	\$14.4454
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	India	48	\$1,646	\$34.2917
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	99072	\$1,265,332	\$12.7718
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	18432	\$249,922	\$13.5591
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	8	\$199	\$24.8750
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Argentina	1920	\$45,349	\$23.6193
Export	2007-10-1	6104912068	IRICO Group Electronics Company Limited	Argentina	1	\$24	\$24.0000
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	22464	\$572,701	\$25.4942
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	16528	\$346,903	\$20.9888

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Malaysia	2592	\$72,755	\$28.0691
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Colombia	2304	\$35,049	\$15.2122
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Egypt	1008	\$15,624	\$15.5000
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	India	38400	\$774,130	\$20.1596
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	India	6	\$142	\$23.6667
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2880	\$80,743	\$28.0358
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2	\$57	\$28.5000
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Turkey	112896	\$1,657,495	\$14.6816
Export	2007-11-1	6104912068	IRICO Group Electronics Company Limited	Turkey	24	\$688	\$28.6667
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Russia	44176	\$859,904	\$19.4654
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	7392	\$120,451	\$16.2948
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Kenya	5568	\$100,224	\$18.0000
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	4872	\$78,960	\$16.2069
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Iran	4608	\$71,424	\$15.5000
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Nigeria	2304	\$37,094	\$16.0998
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	India	10368	\$223,695	\$21.5755
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	India	8	\$187	\$23.3750
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Turkey	161832	\$3,094,780	\$19.1234
Export	2007-12-1	6104912068	IRICO Group Electronics Company Limited	Turkey	3	\$72	\$24.0000

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2006-12-1	6104912066	IRICO Group Electronics Company Limited	Portugal	20016	\$330,264	\$16.5000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	4224	\$99,467	\$23.5481
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	India	5568	\$108,614	\$19.5068
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Germany	12	\$396	\$33.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$37,555	\$16.2999
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	400	\$13,200	\$33.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	1	\$18	\$18.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Russia	14400	\$352,436	\$24.4747
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$76,032	\$16.5000
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	2832	\$120,696	\$42.6186
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	3168	\$89,971	\$28.3999
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	4224	\$116,160	\$27.5000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	64	\$4,070	\$63.5938
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	4320	\$192,384	\$44.5333
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	1056	\$29,568	\$28.0000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	30624	\$845,223	\$27.6000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3168	\$84,480	\$26.6667
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	11520	\$190,080	\$16.5000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	2	\$66	\$33.0000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Egypt	7920	\$131,472	\$16.6000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Turkey	41472	\$638,669	\$15.4000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	4800	\$164,910	\$34.3563
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	43488	\$1,031,601	\$23.7215
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$68,161	\$66.5635
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	576	\$30,528	\$53.0000
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	2304	\$89,856	\$39.0000
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	30624	\$817,616	\$26.6985
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	4224	\$105,857	\$25.0608
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$75,472	\$16.3785
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Japan	2	\$54	\$27.0000
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	105984	\$1,597,975	\$15.0775
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	43584	\$927,934	\$21.2907
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$76,032	\$16.5000
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	6144	\$166,386	\$27.0811
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	India	1008	\$16,934	\$16.7996
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Jordan	96	\$2,592	\$27.0000
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	672	\$22,848	\$34.0000
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$28,180	\$26.6856
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	448	\$30,072	\$67.1250
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	7896	\$253,252	\$32.0735
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	India	18432	\$293,069	\$15.9000
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	1310	\$21,895	\$16.7137
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	3072	\$86,004	\$27.9961
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Kenya	2304	\$37,555	\$16.2999
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Turkey	99072	\$1,481,127	\$14.9500
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Russia	40128	\$988,458	\$24.6326
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Ukraine	512	\$32,590	\$63.6523
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	India	480	\$12,960	\$27.0000
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$27,720	\$26.2500
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	7080	\$312,470	\$44.1342
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	3264	\$67,439	\$20.6615
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	India	3504	\$66,643	\$19.0191
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	6912	\$112,004	\$16.2043
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$29,752	\$12.9132
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Russia	36096	\$865,000	\$23.9639
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	2112	\$51,628	\$24.4451
Export	2006-7-1	6101530001	Xian Irico Display Technology Co., Ltd.	India	13824	\$219,801	\$15.9000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	840	\$28,812	\$34.3000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	India	8	\$300	\$37.5000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Estonia	6336	\$167,904	\$26.5000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	672	\$28,607	\$42.5699
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	2112	\$55,968	\$26.5000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2	\$44	\$22.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	13824	\$222,986	\$16.1304
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	India	8	\$154	\$19.2500
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4	\$100	\$25.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Egypt	4608	\$73,728	\$16.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Russia	31488	\$580,539	\$18.4368
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Turkey	96768	\$1,441,843	\$14.9000
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$28,017	\$26.5313
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	20455	\$512,155	\$25.0381
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Bengal	528	\$13,992	\$26.5000
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$69,799	\$68.1631
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$69,591	\$67.9600
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3136	\$121,082	\$38.6103
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$74,650	\$16.2001
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	10944	\$337,986	\$30.8832
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$73,728	\$16.0000

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Russia	31672	\$755,304	\$23.6980
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	6912	\$110,635	\$16.0062
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Turkey	104308	\$1,552,925	\$14.8879
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Bengal	1152	\$18,432	\$16.0000
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	India	13824	\$221,184	\$16.0000
Export	2006-5-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1568	\$64,066	\$40.8584
Export	2006-5-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	10560	\$268,014	\$25.3801
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Russia	27648	\$444,672	\$16.0833
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2304	\$37,927	\$16.4614
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	India	5616	\$90,864	\$16.1795
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Turkey	57838	\$861,373	\$14.8929
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$26,008	\$12.9008
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3856	\$161,104	\$41.7801
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	4512	\$180,480	\$40.0000
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	2304	\$123,752	\$53.7118
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Thailand	1920	\$66,398	\$34.5823
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	11520	\$186,624	\$16.2000
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	5952	\$176,544	\$29.6613
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	13632	\$333,606	\$24.4723
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2304	\$37,325	\$16.2001
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	9216	\$149,300	\$16.2001
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	3168	\$87,120	\$27.5000
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Germany	72	\$4,465	\$62.0139
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	576	\$32,995	\$57.2830
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	488	\$14,141	\$28.9775
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Egypt	5664	\$96,288	\$17.0000
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Russia	6720	\$133,814	\$19.9128
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	4032	\$119,040	\$29.5238
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2080	\$64,654	\$31.0837
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Argentina	1	\$27	\$27.0000
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$26,008	\$12.9008
Export	2006-2-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1024	\$67,584	\$66.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	1008	\$18,144	\$18.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	White Russia	1	\$25	\$25.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Russia	22752	\$523,575	\$23.0123
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Russia	2016	\$34,272	\$17.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$78,641	\$17.0662
Export	2006-1-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	3840	\$155,232	\$40.4250
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4224	\$111,743	\$26.4543
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	960	\$33,600	\$35.0000
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	8640	\$244,944	\$28.3500
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Japan	9	\$490	\$54.4444
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Thailand	48	\$1,260	\$26.2500
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Portugal	20016	\$330,264	\$16.5000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	4224	\$99,467	\$23.5481
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	India	5568	\$108,614	\$19.5068
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Germany	12	\$396	\$33.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$37,555	\$16.2999
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	400	\$13,200	\$33.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Egypt	1	\$18	\$18.0000
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Russia	14400	\$352,436	\$24.4747
Export	2006-12-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$76,032	\$16.5000
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	2832	\$120,696	\$42.6186
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	3168	\$89,971	\$28.3999
Export	2006-12-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	4224	\$116,160	\$27.5000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	64	\$4,070	\$63.5938
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	4320	\$192,384	\$44.5333
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	1056	\$29,568	\$28.0000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	30624	\$845,223	\$27.6000
Export	2006-11-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3168	\$84,480	\$26.6667
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	11520	\$190,080	\$16.5000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	2	\$66	\$33.0000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Egypt	7920	\$131,472	\$16.6000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Turkey	41472	\$638,669	\$15.4000
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	4800	\$164,910	\$34.3563
Export	2006-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	43488	\$1,031,601	\$23.7215
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$68,161	\$66.5635
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	576	\$30,528	\$53.0000
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	2304	\$89,856	\$39.0000
Export	2006-10-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	30624	\$817,616	\$26.6985
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	4224	\$105,857	\$25.0608
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$75,472	\$16.3785
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Japan	2	\$54	\$27.0000
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	105984	\$1,597,975	\$15.0775
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	43584	\$927,934	\$21.2907
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$76,032	\$16.5000
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	6144	\$166,386	\$27.0811
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	India	1008	\$16,934	\$16.7996

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2006-10-1	6104912068	IRICO Group Electronics Company Limited	Jordan	96	\$2,592	\$27.0000
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	672	\$22,848	\$34.0000
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$28,180	\$26.6856
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	448	\$30,072	\$67.1250
Export	2006-9-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	7896	\$253,252	\$32.0735
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	India	18432	\$293,069	\$15.9000
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	1310	\$21,895	\$16.7137
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	3072	\$86,004	\$27.9961
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Kenya	2304	\$37,555	\$16.2999
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Turkey	99072	\$1,481,127	\$14.9500
Export	2006-9-1	6104912068	IRICO Group Electronics Company Limited	Russia	40128	\$988,458	\$24.6326
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Ukraine	512	\$32,590	\$63.6523
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	India	480	\$12,960	\$27.0000
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$27,720	\$26.2500
Export	2006-8-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	7080	\$31,470	\$44.1342
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	3264	\$67,439	\$20.6615
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	India	3504	\$66,643	\$19.0191
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	6912	\$112,004	\$16.2043
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$29,752	\$12.9132
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Russia	36096	\$865,000	\$23.9639
Export	2006-8-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	2112	\$51,628	\$24.4451
Export	2006-7-1	6101530001	Xian Irico Display Technology Co., Ltd.	India	13824	\$219,801	\$15.9000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	840	\$28,812	\$34.3000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	India	8	\$300	\$37.5000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Estonia	6336	\$167,904	\$26.5000
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	672	\$28,607	\$42.5699
Export	2006-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	2112	\$55,968	\$26.5000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2	\$44	\$22.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	13824	\$222,986	\$16.1304
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	India	8	\$154	\$19.2500
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4	\$100	\$25.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Egypt	4608	\$73,728	\$16.0000
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Russia	31488	\$580,539	\$18.4368
Export	2006-7-1	6104912068	IRICO Group Electronics Company Limited	Turkey	96768	\$1,441,843	\$14.9000
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$28,017	\$26.5313
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	20455	\$512,155	\$25.0381
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Bengal	528	\$13,992	\$26.5000
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$69,799	\$68.1631
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	1024	\$69,591	\$67.9600
Export	2006-6-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3136	\$121,082	\$38.6103
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$74,650	\$16.2001
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	10944	\$337,986	\$30.8832
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Kenya	4608	\$73,728	\$16.0000
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Russia	31872	\$755,304	\$23.6980
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	6912	\$110,635	\$16.0062
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Turkey	104308	\$1,552,925	\$14.8879
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	Bengal	1152	\$18,432	\$16.0000
Export	2006-6-1	6104912068	IRICO Group Electronics Company Limited	India	13824	\$221,184	\$16.0000
Export	2006-5-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1568	\$64,066	\$40.8584
Export	2006-5-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	10560	\$268,014	\$25.3801
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Russia	27648	\$444,672	\$16.0833
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2304	\$37,927	\$16.4614
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	India	5616	\$90,864	\$16.1795
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Turkey	57838	\$861,373	\$14.8929
Export	2006-5-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$26,008	\$12.9008
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3856	\$161,104	\$41.7801
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	4512	\$180,480	\$40.0000
Export	2006-4-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	2304	\$123,752	\$53.7118
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Thailand	1920	\$66,398	\$34.5823
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	11520	\$186,624	\$16.2000
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	5952	\$176,544	\$29.6613
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	13632	\$333,606	\$24.4723
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2304	\$37,325	\$16.2001
Export	2006-4-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	9216	\$149,300	\$16.2001
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	3168	\$87,120	\$27.5000
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Germany	72	\$4,465	\$62.0139
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	576	\$32,995	\$57.2830
Export	2006-3-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	488	\$14,141	\$28.9775
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Egypt	5664	\$96,288	\$17.0000
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Russia	6720	\$133,814	\$19.9128
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	4032	\$119,040	\$29.5238
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2080	\$64,654	\$31.0837
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Argentina	1	\$27	\$27.0000
Export	2006-3-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$26,008	\$12.9008
Export	2006-2-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	1024	\$67,584	\$66.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	1008	\$18,144	\$18.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	White Russia	1	\$25	\$25.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Russia	22752	\$523,575	\$23.0123

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Russia	2016	\$34,272	\$17.0000
Export	2006-2-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4608	\$78,641	\$17.0662
Export	2006-1-1	6101319074	IRICO Display Devices Co., Ltd.	Lithuania	3840	\$155,232	\$40.4250
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4224	\$111,743	\$26.4543
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Lithuania	960	\$33,600	\$35.0000
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	8640	\$244,944	\$28.3500
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Japan	9	\$490	\$54.4444
Export	2006-1-1	6104912068	IRICO Group Electronics Company Limited	Thailand	48	\$1,260	\$26.2500

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2005-12-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	50688	\$1,378,714	\$27.2000
Export	2005-12-1	6101319074	IRICO Display Devices Co., Ltd.	White Russia	1920	\$57,524	\$29.9604
Export	2005-12-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	3200	\$124,768	\$38.9900
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	8640	\$298,080	\$34.5000
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$28,024	\$13.9008
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	White Russia	1	\$36	\$36.0000
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	Turkey	62208	\$995,328	\$16.0000
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4224	\$112,543	\$26.6437
Export	2005-12-1	6104912068	IRICO Group Electronics Company Limited	Russia	17280	\$400,182	\$23.1587
Export	2005-11-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	1152	\$66,025	\$57.3134
Export	2005-11-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	48576	\$1,214,400	\$25.0000
Export	2005-11-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	1056	\$28,512	\$27.0000
Export	2005-11-1	6101319074	IRICO Display Devices Co., Ltd.	White Russia	5280	\$157,936	\$29.9121
Export	2005-11-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	6336	\$156,288	\$24.6667
Export	2005-11-1	6104912068	IRICO Group Electronics Company Limited	Thailand	840	\$21,992	\$26.1810
Export	2005-11-1	6104912068	IRICO Group Electronics Company Limited	Turkey	66816	\$1,052,928	\$15.7586
Export	2005-11-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$41,472	\$18.0000
Export	2005-11-1	6104912068	IRICO Group Electronics Company Limited	Russia	40632	\$809,740	\$19.9286
Export	2005-11-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	24048	\$726,120	\$30.1946
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Mexico	3360	\$124,320	\$37.0000
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Romania	2112	\$63,360	\$30.0000
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	1152	\$66,625	\$57.8342
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	31680	\$770,880	\$24.3333
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	80	\$3,360	\$42.0000
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	16	\$672	\$42.0000
Export	2005-10-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	38848	\$1,027,791	\$26.4567
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	5760	\$144,000	\$25.0000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	5760	\$144,000	\$25.0000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	4032	\$56,048	\$13.9008
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Japan	4	\$240	\$60.0000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Germany	17	\$595	\$35.0000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	India	7488	\$164,736	\$22.0000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Turkey	20736	\$321,408	\$15.5000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$40,320	\$17.5000
Export	2005-10-1	6104912068	IRICO Group Electronics Company Limited	Russia	73392	\$1,280,040	\$17.4411
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	552	\$13,248	\$24.0000
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	7392	\$283,441	\$38.3443
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	25344	\$582,912	\$23.0000
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	408	\$9,792	\$24.0000
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	53760	\$1,315,589	\$24.4715
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Mexico	3360	\$126,000	\$37.5000
Export	2005-9-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$26,200	\$24.8106
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2016	\$37,296	\$18.5000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2016	\$28,024	\$13.9008
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Thailand	1	\$36	\$36.0000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Turkey	4	\$120	\$30.0000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	White Russia	2	\$50	\$25.0000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	1008	\$17,640	\$17.5000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Bengal	3264	\$72,493	\$22.2099
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	India	9792	\$212,544	\$21.7059
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2304	\$40,320	\$17.5000
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Turkey	78336	\$1,219,968	\$15.5735
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Egypt	5656	\$99,504	\$17.5926
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Russia	75960	\$1,394,914	\$18.3638
Export	2005-9-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	5616	\$98,280	\$17.5000
Export	2005-8-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	9216	\$202,752	\$22.0000
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Romania	2112	\$59,136	\$28.0000
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Hong Kong	1056	\$26,728	\$25.3106
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Philippines	400	\$9,600	\$24.0000
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	2016	\$74,131	\$36.7713
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	45408	\$1,044,384	\$23.0000
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	375	\$9,750	\$26.0000
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	22720	\$603,344	\$26.5556
Export	2005-8-1	6101319074	IRICO Display Devices Co., Ltd.	India	2	\$110	\$55.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2016	\$35,280	\$17.5000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	India	7056	\$125,610	\$17.8019
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Indonesia	1008	\$18,583	\$18.4355
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2866	\$58,250	\$20.3957
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Turkey	71424	\$1,142,784	\$16.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Egypt	1365	\$24,570	\$18.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Russia	54816	\$1,026,336	\$18.7233
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	12480	\$337,920	\$27.0769
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	3024	\$46,170	\$15.2679
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	India	5	\$120	\$24.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Germany	12	\$204	\$17.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Argentina	8	\$240	\$30.0000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	Bengal	1008	\$18,648	\$18.5000
Export	2005-8-1	6104912068	IRICO Group Electronics Company Limited	White Russia	4608	\$80,517	\$17.4733
Export	2005-7-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	41472	\$808,704	\$19.5000

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Import/Export	Date	Company Code	Company Name	Destination	Quantity	Total Prices (in USD)	Unit Price (in USD)
Export	2005-7-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	25536	\$978,004	\$38.2990
Export	2005-7-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	50688	\$1,240,800	\$24.4792
Export	2005-7-1	6101319074	IRICO Display Devices Co., Ltd.	Japan	3	\$150	\$60.0000
Export	2005-7-1	6101319074	IRICO Display Devices Co., Ltd.	Turkey	1	\$27	\$27.0000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$41,472	\$18.0000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	India	5040	\$89,048	\$17.6683
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Thailand	288	\$8,570	\$29.7569
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$41,472	\$18.0000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	South Africa	4320	\$81,216	\$18.8000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Russia	59712	\$1,136,064	\$19.0257
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	4608	\$85,248	\$18.5000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	2304	\$42,296	\$18.3576
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Turkey	2	\$66	\$43.0000
Export	2005-7-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2016	\$37,296	\$18.5000
Export	2005-6-1	6101530001	Xian Irico Display Technology Co., Ltd.	Russia	20736	\$373,248	\$18.0000
Export	2005-6-1	6101319074	IRICO Display Devices Co., Ltd.	Bengal	1056	\$30,236	\$28.6326
Export	2005-6-1	6101319074	IRICO Display Devices Co., Ltd.	Thailand	18144	\$794,044	\$43.7635
Export	2005-6-1	6101319074	IRICO Display Devices Co., Ltd.	Egypt	720	\$20,160	\$28.0000
Export	2005-6-1	6101319074	IRICO Display Devices Co., Ltd.	Russia	12192	\$331,008	\$27.1496
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Egypt	672	\$12,432	\$18.5000
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	South Africa	2016	\$37,296	\$18.5000
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Russia	30072	\$719,697	\$23.9325
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	2304	\$42,624	\$18.5000
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Bengal	2016	\$40,320	\$20.0000
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	India	19584	\$464,256	\$23.7059
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Turkey	50688	\$871,834	\$17.2000
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	3528	\$96,067	\$18.0306
Export	2005-6-1	6104912068	IRICO Group Electronics Company Limited	Turkey	2	\$60	\$30.0000
Export	2005-5-1	6101530001	Xian Irico Display Technology Co., Ltd.	Indonesia	4608	\$101,076	\$21.9349
Export	2005-5-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	57600	\$1,064,448	\$18.4800
Export	2005-5-1	6101530001	Xian Irico Display Technology Co., Ltd.	Lithuania	9216	\$234,958	\$25.4946
Export	2005-5-1	6101530001	Xian Irico Display Technology Co., Ltd.	Russia	23040	\$414,720	\$18.0000
Export	2005-5-1	6104911002	China National Electronics Imp.& Exp.Caihong Co.	Turkey	988	\$21,362	\$21.6215
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	India	4608	\$87,552	\$19.0000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Thailand	24	\$710	\$29.5833
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Egypt	2304	\$46,080	\$20.0000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Russia	7488	\$207,360	\$27.6923
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	24	\$684	\$28.5000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Japan	13	\$780	\$60.0000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Singapore	4	\$120	\$30.0000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Turkey	25	\$825	\$33.0000
Export	2005-5-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	1008	\$20,160	\$20.0000
Export	2005-4-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	50688	\$912,384	\$18.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	India	4	\$120	\$30.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Japan	27	\$1,870	\$69.2593
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Egypt	1	\$22	\$22.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Thailand	2304	\$46,080	\$20.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Algeria	1008	\$20,664	\$20.5000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Tunisia	1200	\$24,000	\$20.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Russia	4608	\$93,542	\$20.2999
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Ukraine	2304	\$46,080	\$20.0000
Export	2005-4-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	3528	\$81,552	\$23.1156
Export	2005-3-1	6101530001	Xian Irico Display Technology Co., Ltd.	Algeria	320	\$13,760	\$43.0000
Export	2005-3-1	6101530001	Xian Irico Display Technology Co., Ltd.	Tunisia	2016	\$40,320	\$20.0000
Export	2005-3-1	6101530001	Xian Irico Display Technology Co., Ltd.	Russia	9216	\$235,376	\$25.5399
Export	2005-3-1	6101530001	Xian Irico Display Technology Co., Ltd.	Ukraine	1008	\$21,672	\$21.5000
Export	2005-3-1	6104912068	IRICO Group Electronics Company Limited	Russia	60336	\$1,342,496	\$22.2503
Export	2005-3-1	6104912068	IRICO Group Electronics Company Limited	Algeria	1600	\$68,800	\$43.0000
Export	2005-3-1	6104912068	IRICO Group Electronics Company Limited	Hong Kong	6912	\$148,259	\$21.4495
Export	2005-3-1	6104912068	IRICO Group Electronics Company Limited	Russia	3	\$125	\$41.6667
Export	2005-3-1	6104912068	IRICO Group Electronics Company Limited	Japan	15	\$990	\$66.0000
Export	2005-2-1	6101530001	Xian Irico Display Technology Co., Ltd.	India	4608	\$99,275	\$21.5441
Export	2005-2-1	6101530001	Xian Irico Display Technology Co., Ltd.	Jordan	1000	\$21,500	\$21.5000
Export	2005-2-1	6101530001	Xian Irico Display Technology Co., Ltd.	Thailand	2304	\$46,771	\$20.2999
Export	2005-2-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	73728	\$1,463,040	\$19.8438
Export	2005-2-1	6101530001	Xian Irico Display Technology Co., Ltd.	Russia	18912	\$477,343	\$25.2402
Export	2005-2-1	6104912068	IRICO Group Electronics Company Limited	Philippines	1008	\$21,168	\$21.0000
Export	2005-2-1	6104912068	IRICO Group Electronics Company Limited	Singapore	22	\$715	\$32.5000
Export	2005-1-1	6101530001	Xian Irico Display Technology Co., Ltd.	Hong Kong	2016	\$45,024	\$22.3333
Export	2005-1-1	6101530001	Xian Irico Display Technology Co., Ltd.	Turkey	48384	\$1,006,848	\$20.8095
Export	2005-1-1	6101530001	Xian Irico Display Technology Co., Ltd.	South Africa	2016	\$46,368	\$23.0000
Export	2005-1-1	6101530001	Xian Irico Display Technology Co., Ltd.	White Russia	2112	\$78,976	\$37.3939
Export	2005-1-1	6101530001	Xian Irico Display Technology Co., Ltd.	Russia	36864	\$804,137	\$21.8136
Export	2005-1-1	6104911002	China National Electronics Imp.& Exp.Caihong Co.	Japan	4	\$180	\$45.0000
Export	2005-1-1	6104911002	China National Electronics Imp.& Exp.Caihong Co.	White Russia	5280	\$230,861	\$43.7237
Export	2005-1-1	6104911002	China National Electronics Imp.& Exp.Caihong Co.	Russia	5826	\$233,710	\$40.1150
Export	2005-1-1	6104912068	IRICO Group Electronics Company Limited	Japan	12	\$960	\$80.0000

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Import/Export	Date	Quantity	Total Prices (in USD)	Unit Price (in USD)	Destination	Company Name
Export	2004-12-1	2	\$170	\$85.0537	Japan	IRICO Group Electronics Company Limited
Export	2004-12-1	24480	\$556,489	\$22.7324	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	3840	\$92,218	\$24.0152	Egypt	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	6720	\$189,524	\$28.2029	White Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	27360	\$632,970	\$23.1349	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	4608	\$106,051	\$23.0145	India	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	11520	\$275,830	\$23.9436	Indonesia	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	3312	\$76,224	\$23.0145	Iran	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	2304	\$53,025	\$23.0145	Thailand	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	20848	\$541,400	\$25.9689	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	12528	\$276,799	\$22.0944	Turkey	Xian Irico Display Technology Co., Ltd.
Export	2004-12-1	3168	\$135,518	\$42.7770	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-12-1	6336	\$236,739	\$37.3642	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-11-1	8	\$300	\$50.0316	Japan	IRICO Group Electronics Company Limited
Export	2004-11-1	29952	\$659,360	\$22.0139	Mexico	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	29952	\$697,977	\$23.3032	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	9216	\$220,663	\$23.9435	Indonesia	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	29952	\$698,553	\$23.3224	Turkey	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	4608	\$113,890	\$24.7157	White Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	18128	\$378,432	\$23.4643	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	1008	\$24,207	\$24.0152	Ukraine	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	27216	\$625,512	\$22.9832	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-11-1	6336	\$271,035	\$42.7770	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-10-1	32256	\$758,495	\$23.5148	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	4608	\$106,051	\$23.0145	India	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	9216	\$214,407	\$23.2647	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	1008	\$24,207	\$24.0152	Ukraine	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	4608	\$106,051	\$23.0145	Mexico	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	35712	\$829,994	\$23.2413	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-10-1	3168	\$135,518	\$42.7770	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-9-1	18432	\$435,731	\$23.6399	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	6912	\$165,497	\$23.9435	Indonesia	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	27648	\$640,917	\$23.1813	Turkey	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	4608	\$110,662	\$24.0152	Egypt	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	13824	\$325,069	\$23.5148	Tunisia	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	4808	\$113,890	\$24.7157	White Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	3312	\$76,224	\$23.0145	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	13824	\$318,153	\$23.0145	Mexico	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	57312	\$1,334,706	\$23.2884	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-9-1	2112	\$91,349	\$43.2522	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-9-1	1	\$140	\$140.0884	Japan	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	50688	\$1,159,367	\$22.8726	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	4608	\$105,579	\$22.9120	Indonesia	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	36864	\$829,964	\$22.5142	Turkey	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	4808	\$113,232	\$24.5730	White Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	27648	\$629,943	\$22.7844	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	38880	\$884,732	\$22.7554	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-8-1	8448	\$319,621	\$37.8339	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	4608	\$101,440	\$22.0139	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	2112	\$96,157	\$45.5287	Latvia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	1200	\$58,837	\$49.0310	Algeria	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	2112	\$91,349	\$43.2522	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	2112	\$90,345	\$42.7770	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-8-1	2016	\$34,094	\$16.9115	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	64512	\$1,438,604	\$22.2998	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	4608	\$101,519	\$22.0311	Indonesia	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	18432	\$405,760	\$22.0139	Turkey	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	11520	\$284,724	\$24.7156	Latvia	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	52992	\$1,180,646	\$22.2797	Russia	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	40752	\$904,179	\$22.1873	Hong Kong	Xian Irico Display Technology Co., Ltd.
Export	2004-7-1	3168	\$137,024	\$43.2524	Latvia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	3200	\$155,298	\$48.5306	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	8448	\$361,380	\$42.7770	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	1376	\$88,200	\$64.0986	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	4224	\$161,674	\$38.2751	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	9216	\$202,880	\$22.0139	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	2112	\$91,349	\$43.2522	Latvia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	8448	\$329,680	\$39.0246	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	15840	\$611,660	\$38.6149	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	1600	\$77,649	\$48.5306	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	5648	\$230,834	\$40.8700	Algeria	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-7-1	2	\$46	\$23.0145	India	China National Electronics Imp.& Exp.Caihong Co.

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Export	2004-7-1	20084	\$769,150	\$38.3348	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	62208	\$1,369,440	\$22.0139	Turkey	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	13824	\$313,542	\$22.6810	Russia	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	11520	\$253,600	\$22.0139	Mexico	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	48384	\$1,067,743	\$22.0681	Hong Kong	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	18432	\$412,677	\$22.3891	Hong Kong	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	9216	\$202,579	\$21.9812	Indonesia	Xian Irizo Display Technology Co., Ltd.
Export	2004-6-1	2	\$100	\$50.0316	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	2016	\$34,094	\$16.9115	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	7392	\$284,772	\$38.5243	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	2400	\$116,474	\$48.5306	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	224	\$23,759	\$106.0670	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	4608	\$96,829	\$21.0133	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	13058	\$421,342	\$32.2719	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-6-1	5280	\$240,392	\$45.5287	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	4608	\$101,519	\$22.0311	Indonesia	Xian Irizo Display Technology Co., Ltd.
Export	2004-5-1	25344	\$557,921	\$22.0139	Turkey	Xian Irizo Display Technology Co., Ltd.
Export	2004-5-1	9216	\$239,768	\$26.0164	Lithuania	Xian Irizo Display Technology Co., Ltd.
Export	2004-5-1	4608	\$106,051	\$23.0145	Russia	Xian Irizo Display Technology Co., Ltd.
Export	2004-5-1	30384	\$618,091	\$20.3426	Hong Kong	Xian Irizo Display Technology Co., Ltd.
Export	2004-5-1	2	\$30	\$15.0095	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	34944	\$1,108,484	\$31.7217	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	1056	\$40,560	\$38.4087	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	9216	\$202,880	\$22.0139	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	18432	\$364,262	\$19.7625	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	11520	\$244,285	\$21.2053	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	18912	\$516,330	\$27.3017	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	9552	\$298,324	\$31.2316	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-5-1	512	\$53,794	\$105.0664	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	12576	\$281,435	\$22.3787	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	1152	\$94,524	\$82.0518	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	3136	\$130,460	\$41.6009	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	9216	\$193,658	\$21.0133	Mexico	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	48384	\$1,018,320	\$21.0466	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	19968	\$560,073	\$28.0485	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	2	\$40	\$20.0126	Germany	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-4-1	30818	\$649,787	\$21.0860	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	22178	\$470,320	\$21.2085	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	44352	\$1,256,056	\$28.3202	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	2112	\$81,152	\$38.4244	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	1800	\$80,051	\$50.0316	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	68352	\$1,538,970	\$22.5154	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	2	\$36	\$18.0114	White Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	37440	\$770,366	\$20.5760	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	13824	\$290,488	\$21.0133	Mexico	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-3-1	52992	\$1,093,017	\$20.6261	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	2576	\$130,034	\$50.4791	Thailand	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	16800	\$464,934	\$27.6746	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	5280	\$226,343	\$42.8880	Latvia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	3872	\$130,595	\$33.7279	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	47088	\$980,626	\$20.8254	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	19298	\$455,983	\$23.6310	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	21696	\$711,748	\$32.8055	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	25344	\$523,584	\$20.6591	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	4	\$690	\$172.6091	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-2-1	20672	\$493,632	\$23.8793	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	25344	\$501,359	\$19.7822	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	2018	\$40,923	\$20.2990	India	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	36528	\$1,086,330	\$29.7397	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	8736	\$364,166	\$41.6857	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	1530	\$45,929	\$30.0190	Egypt	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	4032	\$88,760	\$22.0139	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	11520	\$242,073	\$21.0133	Mexico	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	25344	\$484,376	\$19.1121	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	25344	\$529,102	\$20.8768	Russia	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	12	\$624	\$52.0329	India	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	3	\$168	\$56.0354	Japan	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	1	\$20	\$20.0126	Turkey	China National Electronics Imp.& Exp.Caihong Co.
Export	2004-1-1	75648	\$1,555,769	\$20.5659	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.

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0	Export	2003-12-1	\$654,048.38	27072	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$1,050,828.63	36352	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$92,697.05	4608	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$23,184.01	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$293,760.19	13824	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$120,823.07	6048	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$80,438.05	4032	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$45,440.03	2016	Egypt	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$387,632.22	12384	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$840,192.50	37536	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$1,611,113.00	75840	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-12-1	\$105,984.07	4608	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$262,928.16	7312	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$115,262.06	3536	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$687,859.38	33552	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$234,749.14	6336	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$1,275,648.75	62016	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$333,696.19	8448	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$265,972.16	13824	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$165.00	6	Germany	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$41.00	2	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-11-1	\$2,815,980.50	133792	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$404,208.25	13536	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$41,184.02	1056	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$71,568.05	3024	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$42,336.02	2016	Bulgaria	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$552,960.31	27648	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$542,653.31	22464	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$474,320.31	12320	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$136,187.08	6912	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$337,920.19	8448	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$144,949.09	7069	Thailand	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$235,760.14	6160	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$900.00	30	U.K.	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-10-1	\$1,834,130.00	91888	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$102.00	2	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$481,125.31	14112	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$1,293,610.75	63840	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$78,523.05	4032	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$105,984.07	4608	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$101,376.06	4608	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$120,000.08	2400	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$1,659,313.00	83232	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$1,172,826.75	48880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$40,000.02	800	Greece	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$361,104.22	9456	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-9-1	\$3,164,023.75	157200	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$502,557.28	21936	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$353,760.22	8800	Lithuania	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$302,963.19	9600	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$82,671.05	3072	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$71,175.05	3024	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$2,606,488.50	133056	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$55,927.03	3024	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$200.00	3	Taiwan	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-8-1	\$2,207,680.25	102528	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$123,531.07	6048	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$24,192.01	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$133,056.08	3168	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$2,760,409.50	139104	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$20,140.01	400	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$45,965.03	2304	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$206,880.13	10080	Thailand	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$208.00	6	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$2,503,843.50	122976	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-7-1	\$518,268.28	6144	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$50,275.03	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$471,358.28	15552	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$85,800.05	4032	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$177,822.11	7968	Indonesia	China National Electronics Imp.& Exp.Caihong Co.

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0	Export	2003-6-1	\$270,864.16	10032	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$507,692.31	24768	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$1,561,393.00	74592	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$209,480.14	10080	Thailand	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$3,500.00	100	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$109.00	4	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$1,372,392.88	66928	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-6-1	\$40.00	2	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$74,340.05	3024	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$1,655,279.00	54912	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$23,184.01	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$377,539.22	17568	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$1,324,512.75	60480	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$43.00	2	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$564.00	24	Germany	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$450.00	8	Japan	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-5-1	\$1,747,691.13	76368	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$45,360.03	2016	India	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$1,052,593.63	33840	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$23,184.01	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$49,905.03	2304	Philippines	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$46,932.03	2016	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$86,592.05	2112	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$159,768.09	5136	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$737,856.44	32256	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$86,184.05	4032	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$145,152.09	6048	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$848,708.50	40608	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$21,000.01	600	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$21,672.01	1008	Thailand	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$1,355,556.75	62064	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-4-1	\$34.00	2	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$679,841.38	23088	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$283,776.19	8832	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$72,576.05	3024	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$22,680.01	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$74,189.04	3024	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$253,955.16	12096	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$645,120.38	28224	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$48,720.03	1392	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$55,872.04	2304	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$1,090,698.63	48384	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$39,112.02	2016	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-3-1	\$485.00	24	U.K.	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$55,296.03	2304	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$25,489.02	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$467,190.28	15312	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$435,456.25	18144	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$148,176.08	6048	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$1,890.00	54	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$379,424.25	16128	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-2-1	\$2,999.00	8	Japan	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$246,528.16	10368	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$3,542.00	152	Thailand	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$55,757.04	2304	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$106,376.06	4608	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$25,200.01	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$142,349.08	4416	Finland	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$74,088.04	3024	Russia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$584,237.31	24192	Turkey	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$430,449.25	15744	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$50,501.03	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$2,174.00	8	Japan	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$226.00	4	Italy	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$521,411.31	22176	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$78,224.05	4032	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
0	Export	2003-1-1	\$53.00	1	Russia	China National Electronics Imp.& Exp.Caihong Co.

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Year	Month	Import/Export	Unit Price (in USD)	Total Prices (in USD)	Quantity	Destination	Destination	Company Name
2002	1	Export	\$26,0632	\$1,118,422	42912	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$23,0000	\$834,624	36288	111	India	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$24,4000	\$836,236	34272	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$25,2594	\$203,692	8084	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$26,0000	\$157,248	6048	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$25,2039	\$101,622	4032	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$25,5000	\$102,816	4032	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$25,0000	\$100,800	4032	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$24,3667	\$73,685	3024	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$24,1007	\$48,587	2016	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$38,0000	\$76,000	2000	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$26,1002	\$26,309	1008	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	1	Export	\$28,0000	\$28	1	336	Lithuania	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$23,8341	\$720,744	30240	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$24,4000	\$393,523	16128	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$24,3750	\$393,120	16128	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$32,3861	\$234,216	7232	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$31,6350	\$139,700	4416	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$24,6528	\$49,700	2016	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$26,1002	\$26,309	1008	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$25,2510	\$25,352	1004	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$38,0000	\$7,600	200	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$23,5000	\$141	6	304	Germany	China National Electronics Imp & Exp Caihong Co.
2002	2	Export	\$131,6000	\$658	5	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$23,5313	\$1,091,098	46368	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$23,8462	\$312,480	13104	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$24,9129	\$251,122	10080	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$37,1436	\$320,772	8636	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$23,8000	\$191,923	8084	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$36,5141	\$259,250	7100	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$26,1002	\$78,927	3024	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$25,5000	\$77,112	3024	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$20,7999	\$47,923	2304	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$23,9961	\$55,287	2304	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$23,4008	\$47,176	2016	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$50,3226	\$1,560	31	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$25,0000	\$50	2	215	Egypt	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$24,5000	\$49	2	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$37,5000	\$75	2	111	India	China National Electronics Imp & Exp Caihong Co.
2002	3	Export	\$42,0000	\$42	1	429	Mexico	China National Electronics Imp & Exp Caihong Co.
2002	3	Import	\$63,6667	\$382	6	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$23,3675	\$1,554,596	66528	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$23,9091	\$530,208	22176	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$23,0040	\$463,760	20160	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$29,5166	\$359,866	12192	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$24,5000	\$197,568	8084	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$24,7718	\$174,790	7058	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$25,8086	\$126,772	4912	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$26,6260	\$107,356	4032	141	Vietnam	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$41,0500	\$164,200	4000	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$24,5000	\$49,392	2016	307	Italy	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$24,4598	\$49,311	2016	143	Taiwan	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$41,3306	\$35,131	850	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$103,3750	\$1,654	16	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$23,0000	\$92	4	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$28,0000	\$112	4	111	India	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$39,5000	\$79	2	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$39,5000	\$79	2	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$34,0000	\$68	2	122	Malaysia	China National Electronics Imp & Exp Caihong Co.
2002	4	Export	\$24,0000	\$24	1	303	U.K.	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$23,6645	\$2,099,137	88704	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$23,8952	\$1,011,629	42336	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$33,2025	\$433,492	13056	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$23,2024	\$233,880	10080	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$25,1758	\$202,615	8048	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$40,5526	\$171,294	4224	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$24,5000	\$98,784	4032	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$41,0000	\$86,592	2112	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$33,0678	\$61,440	1858	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$39,8371	\$42,068	1056	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$25,4000	\$127	5	111	India	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$31,0000	\$124	4	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$39,0000	\$78	2	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	5	Export	\$56,0000	\$56	1	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	5	Import	\$50,1111	\$451	9	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$23,5040	\$1,516,290	64512	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$23,8583	\$1,154,362	48384	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$23,8667	\$721,728	30240	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$29,8296	\$410,933	13776	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$27,6606	\$267,312	9684	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$23,9994	\$202,747	8448	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$19,7999	\$91,238	4608	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$40,5265	\$171,184	4224	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$25,5000	\$102,816	4032	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$23,0300	\$92,857	4032	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$24,0000	\$96,768	4032	111	India	China National Electronics Imp & Exp Caihong Co.

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Year	Month	Import/Export	Unit Price (in USD)	Total Prices (in USD)	Quantity	Destination	Destination	Company Name
2002	6	Export	\$36.0998	\$124,761	3456	122	Malaysia	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$29.2868	\$89,969	3072	129	Philippines	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$38.0000	\$12,540	330	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$27.9167	\$335	12	132	Singapore	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$25.3333	\$228	9	111	India	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$31.0000	\$124	4	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$40.6667	\$122	3	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$25.0000	\$50	2	215	Egypt	China National Electronics Imp & Exp Caihong Co.
2002	6	Export	\$31.0000	\$62	2	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$25.8713	\$2,188,502	84592	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$29.3513	\$1,631,464	55584	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$23.9000	\$1,060,014	44352	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$23.8429	\$672,941	28224	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$25.1961	\$533,350	21168	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$25.0000	\$172,800	8912	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$24.0000	\$96,768	4032	111	India	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$35.5340	\$110,866	3120	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$24.5000	\$74,088	3024	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$24.5000	\$24,696	1008	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	7	Export	\$53.0000	\$53	1	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	7	Import	\$53.0000	\$53	1	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$27.7891	\$1,798,957	64736	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$28.9717	\$998,480	34464	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$23.9000	\$626,372	26208	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$23.2024	\$233,880	10080	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$23.4286	\$165,312	7056	111	India	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$24.0000	\$145,152	6048	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$24.6849	\$113,748	4608	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$40.5526	\$171,294	4224	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$22.3249	\$90,014	4032	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$19.7999	\$45,619	2304	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$43.0000	\$75,680	1760	215	Egypt	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$35.7500	\$143	4	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$25.0000	\$50	2	215	Egypt	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$25.0000	\$25	1	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	8	Export	\$24.0000	\$24	1	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$25.5783	\$2,009,432	78560	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$30.5718	\$738,126	24144	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$40.1041	\$788,608	19864	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$23.9375	\$386,064	16128	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$23.9000	\$337,277	14112	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$24.1280	\$340,494	14112	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$23.1032	\$232,880	10080	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$24.5000	\$197,568	8084	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$24.0000	\$145,152	6048	111	India	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$22.7366	\$137,511	6048	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$32.3913	\$143,040	4418	122	Malaysia	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$24.0000	\$48,384	2016	502	U.S.A	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$25.6002	\$25,805	1008	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$38.6667	\$116	3	340	White Russia	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$43.0000	\$129	3	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$39.0000	\$78	2	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$41.0000	\$41	1	111	India	China National Electronics Imp & Exp Caihong Co.
2002	9	Export	\$19.0000	\$19	1	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	9	Import	\$53.1667	\$638	12	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	9	Import	\$50.2500	\$201	4	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	9	Import	\$60.0000	\$60	1	122	Malaysia	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$24.6470	\$2,334,560	94720	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$25.6071	\$722,736	28224	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$24.0000	\$532,224	22176	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$34.3574	\$367,762	10704	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$23.3413	\$235,280	10080	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$42.9400	\$362,757	8448	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$21.9246	\$183,114	8352	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$41.0000	\$173,184	4224	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$25.6002	\$51,610	2016	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$43.0000	\$12,900	300	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$40.8000	\$204	5	133	North Korea	China National Electronics Imp & Exp Caihong Co.
2002	10	Export	\$45.5000	\$91	2	502	U.S.A	China National Electronics Imp & Exp Caihong Co.
2002	10	Import	\$60.0000	\$600	10	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	10	Import	\$87.0000	\$87	1	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$25.1644	\$2,068,716	82208	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$28.7712	\$707,081	24576	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$24.0000	\$435,456	18144	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$33.9345	\$280,163	8286	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$41.0000	\$259,776	6336	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$22.4955	\$119,856	5328	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$23.6649	\$78,378	3312	129	Philippines	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$24.5000	\$56,448	2304	122	Malaysia	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$24.0000	\$48,384	2016	111	India	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$24.8000	\$124	5	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$16.3333	\$49	3	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$23.5000	\$47	2	136	Thailand	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$26.0000	\$26	1	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	11	Export	\$26.0000	\$26	1	132	Singapore	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$24.2014	\$2,195,549	90720	110	Hong Kong	China National Electronics Imp & Exp Caihong Co.

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2002	12	Export	\$29.2666	\$424,248	14498	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$24.5000	\$169,344	6912	344	Russia	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$41.0000	\$173,184	4224	318	Finland	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$39.7898	\$168,072	4224	112	Indonesia	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$24.0000	\$96,768	4032	137	Turkey	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$24.0000	\$96,768	4032	111	India	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$25.6002	\$77,415	3024	244	South Africa	China National Electronics Imp & Exp Caihong Co.
2002	12	Export	\$5.0000	\$51	1	138	United Arab Emirates	China National Electronics Imp & Exp Caihong Co.
2002	12	Import	\$63.8125	\$1,021	16	116	Japan	China National Electronics Imp & Exp Caihong Co.
2002	12	Import	\$112.0000	\$112	1	111	India	China National Electronics Imp & Exp Caihong Co.

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Year	Month	Import/Export	Unit Price (in USD)	Total Prices (in USD)	Quantity	Destination	Company Name
2001	1	Export	\$37.8421	\$1,740,736	46000	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$29.6000	\$298,368	10080	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$28.5000	\$229,824	8064	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$29.3001	\$118,138	4032	Italy	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$30.5000	\$30,744	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$40.2500	\$3,864	96	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	1	Export	\$32.0000	\$256	8	Singapore	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$29.3000	\$2,067,408	70560	Italy	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$32.8051	\$924,840	28192	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$30.8592	\$668,257	21655	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$29.9008	\$120,560	4032	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$48.0000	\$84,480	1760	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$46.0754	\$79,480	1725	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$48.2500	\$38,600	800	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$38.1875	\$1,833	48	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$40.2500	\$966	24	Singapore	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$32.0000	\$96	3	Singapore	China National Electronics Imp.& Exp.Caihong Co.
2001	2	Export	\$112.5000	\$225	2	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$33.8284	\$2,852,952	84336	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$28.8000	\$812,851	28224	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$28.8000	\$812,851	28224	Italy	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$30.8016	\$620,960	20160	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$48.0000	\$126,720	2640	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$31.0000	\$62,496	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$30.0685	\$60,618	2016	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$38.0000	\$76,000	2000	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$46.0750	\$40,546	880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	3	Export	\$93.5000	\$187	2	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$28.9525	\$3,443,730	118944	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$28.5000	\$1,264,032	44352	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$30.7337	\$1,003,640	32656	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$28.8000	\$928,973	32256	Italy	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$29.9008	\$60,280	2016	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$46.0750	\$81,092	1760	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	4	Export	\$33.6515	\$26,652	792	Singapore	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$28.0000	\$1,580,544	56448	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$30.2204	\$718,520	23776	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$36.0773	\$104,480	2896	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$30.8998	\$62,294	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$29.0536	\$58,572	2016	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$29.5000	\$29,736	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$28.0000	\$560	20	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$36.2000	\$724	20	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$16.6667	\$300	18	U.K.	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$46.0000	\$184	4	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	5	Export	\$131.0000	\$262	2	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$28.6629	\$565,920	19744	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$34.7866	\$100,742	2896	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$38.0000	\$76,000	2000	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$30.7996	\$31,046	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$26.7024	\$26,916	1008	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$46.0750	\$40,546	880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$45.5898	\$40,119	880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$38.5000	\$15,400	400	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$47.0000	\$94	2	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	6	Export	\$26.5000	\$53	2	India	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$27.8578	\$1,341,188	48144	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$26.0000	\$262,080	10080	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$26.7676	\$188,872	7056	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$26.1768	\$127,324	4864	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$49.5000	\$237,600	4800	Egypt	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$27.5784	\$111,196	4032	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$28.1667	\$85,176	3024	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$27.0000	\$81,648	3024	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$26.5025	\$53,429	2016	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$13.1818	\$290	22	Singapore	China National Electronics Imp.& Exp.Caihong Co.
2001	7	Export	\$9.3333	\$56	6	U.K.	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$27.5416	\$971,226	35264	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$26.0000	\$733,824	28224	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$26.0000	\$524,160	20160	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$26.4858	\$480,559	18144	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$27.0000	\$163,296	6048	Russia	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$26.7421	\$80,868	3024	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$34.2659	\$99,234	2896	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$27.1032	\$54,640	2016	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$26.4008	\$53,224	2016	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.

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Year	Month	Import/Export	Unit Price (in USD)	Total Prices (in USD)	Quantity	Destination	Company Name
2001	8	Export	\$44.5000	\$56,960	1280	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	8	Export	\$29.5000	\$29,736	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$27.1091	\$1,359,790	50160	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$26.0946	\$631,280	24192	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$26.0000	\$628,992	24192	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$26.0000	\$262,080	10080	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$26.9281	\$108,574	4032	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$29.5000	\$29,736	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$25.7996	\$26,006	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$23.0000	\$828	36	India	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$9.3750	\$225	24	U.K.	China National Electronics Imp.& Exp.Caihong Co.
2001	9	Export	\$180.0000	\$720	4	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$26.2043	\$1,341,659	51200	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$23.0000	\$556,416	24192	India	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$26.5784	\$53,582	2016	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$25.5000	\$51,408	2016	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$28.5000	\$28,728	1008	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$38.5000	\$7,700	200	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$110.0000	\$660	6	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	10	Export	\$85.0000	\$170	2	India	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$25.0302	\$1,715,673	68544	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$23.0000	\$834,624	36288	India	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$25.0357	\$706,608	28224	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$25.2015	\$406,450	16128	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$26.7173	\$107,724	4032	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$25.5000	\$25,704	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$43.0000	\$37,840	880	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$40.8898	\$35,983	880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$38.0000	\$11,400	300	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$84.5556	\$761	9	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$34.5000	\$207	6	White Russia	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$25.5000	\$102	4	Italy	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$34.5000	\$69	2	North Korea	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$42.5000	\$85	2	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$27.0000	\$54	2	Russia	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$41.5000	\$83	2	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	11	Export	\$43.0000	\$43	1	Vietnam	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$32.4827	\$3,099,113	95408	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$23.0000	\$556,416	24192	India	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$24.9222	\$452,189	18144	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$25.5000	\$102,816	4032	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$25.2321	\$76,302	3024	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$40.4205	\$42,684	1056	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$25.0000	\$25,200	1008	Malaysia	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$38.8430	\$4,700	121	Japan	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$26.9167	\$646	24	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$131.5833	\$1,579	12	Germany	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$131.5833	\$1,579	12	U.K.	China National Electronics Imp.& Exp.Caihong Co.
2001	12	Export	\$131.5000	\$263	2	Japan	China National Electronics Imp.& Exp.Caihong Co.

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2000	3	Export	\$28.5000	\$1,896,048	66528	Turkey	IRICO Group Corporation
2000	4	Export	\$28.5000	\$3,332,448	116928	Turkey	IRICO Group Corporation
2000	5	Export	\$28.5000	\$2,872,800	100800	Turkey	IRICO Group Corporation
2000	6	Export	\$28.5000	\$1,723,680	60480	Turkey	IRICO Group Corporation
2000	7	Export	\$28.5000	\$3,964,464	139104	Turkey	IRICO Group Corporation
2000	7	Export	\$28.5000	\$1,723,680	60480	Turkey	IRICO Group Corporation
2000	1	Export	\$27.7192	\$3,492,619	126000	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	1	Export	\$37.1247	\$247,696	6672	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	1	Export	\$29.8016	\$120,160	4032	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	1	Export	\$48.0000	\$42,240	880	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	1	Export	\$29.0000	\$1,392	48	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$28.5892	\$2,132,525	74592	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$30.1105	\$1,701,794	56518	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$40.9104	\$339,720	8304	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$29.0000	\$233,856	8064	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$30.0000	\$150	5	Japan	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$39.5000	\$158	4	North Korea	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$48.5000	\$97	2	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	2	Export	\$30.0000	\$60	2	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$31.1706	\$2,386,424	76560	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$28.6158	\$1,096,099	38304	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$30.9800	\$618,112	19952	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$29.9367	\$301,762	10080	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$36.6084	\$264,752	7232	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$29.7388	\$179,860	6048	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$48.0000	\$103,680	2160	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$46.5977	\$41,006	880	Indonesia	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$48.0000	\$42,240	880	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$39.5000	\$158	4	North Korea	China National Electronics Imp. & Exp. Caihong Co.
2000	3	Export	\$30.0000	\$60	2	Spain	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$28.7951	\$1,190,045	41328	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$30.4048	\$1,182,624	38896	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$31.0970	\$708,016	22768	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$39.3999	\$727,480	18464	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$41.3154	\$644,520	15600	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$48.0000	\$103,680	2160	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$31.0000	\$31,248	1008	South Africa	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$46.0750	\$40,546	880	Indonesia	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$29.0000	\$2,784	96	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	4	Export	\$49.1667	\$295	6	Japan	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$37.1682	\$3,645,156	98072	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$28.5000	\$919,296	32256	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$29.5692	\$894,174	30240	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$32.6738	\$440,704	13488	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$46.9527	\$495,820	10560	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$49.5000	\$237,600	4800	Egypt	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$48.0000	\$84,480	1760	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$62.6667	\$940	15	Japan	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$29.0000	\$174	6	India	China National Electronics Imp. & Exp. Caihong Co.
2000	5	Export	\$36.0000	\$36	1	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$38.7027	\$2,999,616	77504	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$29.4257	\$1,275,426	43344	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$35.1632	\$610,996	17376	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$30.8457	\$351,148	11384	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$48.0000	\$103,680	2160	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$25.5769	\$665	26	Japan	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$47.7500	\$191	4	Singapore	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$30.0000	\$60	2	India	China National Electronics Imp. & Exp. Caihong Co.
2000	6	Export	\$28.0000	\$56	2	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$34.5543	\$1,932,832	55936	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$26.9000	\$976,147	36288	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$29.8950	\$512,280	17136	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$30.6280	\$246,984	8064	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$48.0000	\$122,880	2560	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$30.2039	\$60,891	2016	Thailand	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$46.7500	\$37,400	800	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$38.4000	\$1,536	40	North Korea	China National Electronics Imp. & Exp. Caihong Co.
2000	7	Export	\$70.0000	\$280	4	Japan	China National Electronics Imp. & Exp. Caihong Co.
2000	8	Export	\$28.5910	\$3,833,021	134064	Turkey	China National Electronics Imp. & Exp. Caihong Co.
2000	8	Export	\$38.3900	\$2,147,076	55928	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	8	Export	\$36.5521	\$1,954,512	53472	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	8	Export	\$47.4318	\$1,460,900	30800	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.
2000	8	Export	\$38.1935	\$397,824	10416	Hong Kong	China National Electronics Imp. & Exp. Caihong Co.

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2000	8	Export	\$30.2535	\$121,982	4032	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	8	Export	\$28.0000	\$56,448	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2000	8	Export	\$30.7520	\$61,996	2016	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	8	Export	\$46.0750	\$81,092	1760	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	8	Export	\$40.0000	\$40	1	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$34.0071	\$2,942,024	86512	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$28.5000	\$1,953,504	68544	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$29.5463	\$786,640	26624	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$45.6587	\$566,898	12416	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$48.0000	\$272,640	5680	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$32.0000	\$64,512	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$48.1295	\$84,708	1760	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$46.0750	\$40,546	880	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$42.7143	\$598	14	North Korea	China National Electronics Imp.& Exp.Caihong Co.
2000	9	Export	\$48.0000	\$96	2	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	10	Export	\$28.5000	\$4,481,568	157248	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	10	Export	\$35.6405	\$1,898,924	53280	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	10	Export	\$45.6000	\$80,256	1760	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$28.5000	\$3,102,624	108864	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$33.7022	\$2,129,441	63184	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$28.8235	\$987,840	34272	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$30.5017	\$184,474	6048	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$49.5000	\$237,600	4800	Egypt	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$48.0000	\$184,320	3840	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$46.8631	\$164,958	3520	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$31.7520	\$64,012	2016	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$51.3000	\$513	10	Japan	China National Electronics Imp.& Exp.Caihong Co.
2000	11	Export	\$132.0000	\$132	1	Canada	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$28.5000	\$2,183,328	76608	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$28.5000	\$2,183,328	76608	Turkey	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$29.8895	\$1,867,976	62496	Hong Kong	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$29.7078	\$119,782	4032	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$34.8847	\$101,026	2896	Indonesia	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$28.0000	\$56,448	2016	South Africa	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$47.9608	\$84,411	1760	Thailand	China National Electronics Imp.& Exp.Caihong Co.
2000	12	Export	\$84.6667	\$508	6	Japan	China National Electronics Imp.& Exp.Caihong Co.

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